Technical Enforcement Support at Hazardous Waste Sites
TES 11 - Zone 4

09-25-91

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DCN: TZ4-R09022-IS-M09026

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

ENVIRONMENTAL PROTECTION AGENCY
REGION IX

HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE

OIL PROCESS COMPANY
5756 Alba Street
Los Angeles, CA 90058

October 1991

Submitted to:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 HAWTHORNE STREET
SAN FRANCISCO, CALIFORNIA 94105

Submitted by:

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION
TECHNOLOGY SERVICES COMPANY
20 CALIFORNIA STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94111

EPA CONTRACT NO. 68-W9-0008
EPA WORK ASSIGNMENT NO. RO9022
SAIC/TSC PROJECT NO. 06-0794-03-0637-050

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

ENVIRONMENTAL PROTECTION AGENCY
REGION IX

HAZARDOUS WASTE MANAGEMENT DIVISION
WASTE COMPLIANCE

Facility:	Oil Process Company 5756 Alba Street Los Angeles, CA 90058 (213) 585-5063
EPA ID Number:	CAD050806850
Date of Inspection:	September 25, 1991
Inspectors:	Julie Anne Poust Science Applications International Corporation Technology Services Company 20 California Street, Suite 400 San Francisco, CA 94111 (415) 399-0140 Nancy Carder Department of Toxic Substances Control Surveillance & Enforcement Unit Burbank, CA (818) 567-3051 Andy Bajwa Department of Toxic Substances Control Facility Permit Unit Burbank, CA (818) 567-3122
Facility Representatives:	Tim Sloan, Technical Manager Robert Gold, Shipping/Receiving Manager Victoria Valliere, Health & Safety Manager Chris Lilley, Drum Process Manager Desmond Phillips, Treatment Plant Manager
Report Prepared By:	Julie Anne Poust
Report Date:	October 18, 1990

INTRODUCTION

Oil Process Company (EPA ID No. CAD050806850), located in Los Angeles, California, adjacent to Vernon and Huntington, California, began operations in 1979 when they were a transporter of hazardous wastes. Oil Process began receiving off-site generated wastes for treatment in June 1985. Currently, they operate as a drum storage facility, wastewater treatment facility, and a container repackaging facility. In addition, Oil Process operates as a transfer facility for Chem-Pak, a lab-packaging division of Rollins Environmental Services.

Treatment of wastewaters consists of oxidation for cyanide wastewaters, reduction of hexavalent chrome wastewaters, and solidification and neutralization of wastewaters with heavy metals. The eventual disposal mechanism is to the sanitary sewer. Residues generated from the treatment activities (consisting of filter cake and spent activated carbon) are collected in roll-off boxes and disposed of off-site.

The container repackaging operations consist of bulking incoming wastes into homogenous wastestreams for off-site disposal at one of the hazardous waste incinerators operated by Rollins Environmental Services in Deer Park, Texas or Baton Rouge, Louisiana. Residues remaining from the bulking and repackaging operations consist of crushed drums which are collected in roll-off boxes and are landfilled at Chemical Waste Management in Kettleman City, California.

Oil Process Company is owned and operated by Oil Inc., doing business as Oil Process Company. Oil Inc. is a wholly owned subsidiary of Rollins Environmental Services. (Rollins Environmental Services purchased Oil Inc. in December 1988.)

Permit Status

Oil Process submitted a Part A Permit Application to the California Department of Health Services/Toxic Substance Control Division (DHS) on August 6, 1980 for

treatment and storage of hazardous waste in containers and tanks, and were subsequently granted interim status.

On June 3, 1985, Oil Process was issued a RCRA-equivalent Hazardous Waste Facility Permit by DHS, which expired on June 3, 1990. Oil Process submitted a revised Part B Permit Application on March 30, 1989. The EPA and DHS issued a revised RCRA Hazardous Waste Facility Permit on July 18, 1990 and May 29, 1990, respectively, to allow Oil Process to continue operating a storage, treatment, and transfer facility, to close the existing drum storage pad and roll-off container storage areas, to replace the existing storage/treatment tanks, and to add new tanks, a rail car storage area, and a new drum storage area. The EPA permit was effective on August 27, 1990 and expires on August 27, 1995.

On August 31, 1990, Oil Process' hazardous waste hauler's registration expired. The current hauler is Custom Environmental Transport (CET), another wholly-owned subsidiary of Rollins Environmental Services.

Summary of Previous Compliance Evaluation Inspections (CEI)

On March 12, 1990, the EPA conducted a CEI at Oil Process and evaluated them against their June 1985 RCRA Hazardous Waste Facility Permit (HWFP). The following is a list of the violations observed.

HWFP III. C.1.d.(5):	Oil Process failed to label seven drums in the drum storage area with a date.
HWFP III. C.1.c.:	Several drums in the drum storage area were too close to the outside berm.
HWFP III. P.2.a.(1) and (2):	Oil Process' inventory log was not current regarding the waste in storage in the drum storage area in that drums had been delivered and were not accounted for on the inventory list for that day.
HWFP III C.1.d.:	The following units were not labeled as hazardous waste: A roll-off bin used for storage of waste-activated charcoal, two 5,000-gallon portable storage tanks, and a roll-off bin used for spent pickling waste.

HWFP III. G.1.c., and d.:	A roll-off bin containing spent pickling waste was received on March 9, 1990 and had an unsigned manifest attached (#88379215).
HWFP III. K. 2., 3., 6., and 7.:	A new weekly inspection checklist did not include checking emergency equipment or the two portable 5,000 gallon storage tanks. The checklist was not maintained on-site.
HWFP III. L.2., and 4.:	The master list for the training records indicated that three employees had not received their 40-hour OSHA training, however, they were employed from 4-6 years.
HWFP III. P.1.b.(2), and c.(2):	Training records were not maintained on-site.
40 CFR Part 268.7(a):	The waste analysis plan failed to describe which of the test methods are used to analyze incoming and outgoing hazardous waste. It was unclear if the filter cake was analyzed for LDR waste. The waste analysis plan did not mention the Paint Filter Liquid Test to demonstrate the absence or presence of liquid. The waste analysis plan failed to identify which hazardous wastes were LDR.

Beginning on March 6, 1991, DHS conducted a CEI at Oil Process and evaluated them against their May 1990 RCRA Hazardous Waste Facility Permit (HWFP), and the California Code of Regulations, Title 22, Chapter 30 (Title 22). The following is a list of the violations observed:

HWFP III. C.1.a.:	Oil Process stored off-site hazardous waste in areas not designated in their approved Operation Plan. The wastes included lab-packs and bulked drums in two container storage trailers, flammables in a tanker truck, contaminated soils in a roll-off bin, and lab-packed wastes outside of the containment area.
Title 22, Section 67245(a):	Oil Process operated unauthorized container storage areas without providing secondary containment.
Title 22, Section 67124:	Oil Process failed to maintain adequate aisle space in the drum storage area and the unauthorized container storage trailers.

Title 22, Section 66508(a)(2) and (c):	Oil Process failed to maintain hazardous waste labels on containers in the permitted drum storage area and the unauthorized container storage trailers.
Title 22, Section 67104(b)(3) and (d):	Oil Process failed to inspect lab-packs and drums in two container storage trailers. Oil Process failed to document on the inspection log containers that were not tightly closed, and also failed to include remedial actions on Fire Extinguisher Inspection Logs.
Title 22, Section 66508(b):	Oil Process stored waste carbon in a roll-off bin in excess of 90 days.
Title 22, Section 67246:	Oil Process stored flammable liquid waste in a tanker truck within 50 feet of the property boundary.
Title 22, Section 67243:	Oil Process failed to keep closed three 55-gallon drums and four overpack containers.

INVESTIGATION

In preparation for this CEI, the previous CEI report, and the May 1990 RCRA Hazardous Waste Facility Permit were reviewed. In addition, Nancy Carder and Andy Bajwa were interviewed to coordinate DTSC's enforcement efforts. The CEI was unannounced.

HAZARDOUS WASTE MANAGEMENT UNITS

Drum Storage Pad

The drum storage pad consists of a concrete pad and secondary containment walls capable of holding a total of 7,480 gallons. This unit will be replaced by a new drum storage pad with a total capacity of 140,540 gallons or 2,411 55-gallon containers.

Drums of waste are off-loaded in front of the Drum Storage Pad, where the containers are inspected for integrity. A sample is pulled by a drum storage pad employee, managed by Chris Lilley, and brought to the on-site lab to be fingerprinted. A copy of the manifest is given to the shipping supervisor, and

the original is given to Robert Gold to be reviewed for completeness. If the container is accepted by Oil Process, Chris Lilley assigns a tracking number to each container (a sequential number). The drum tracking number is recorded on a written waste receipt log, and cross-referenced on all waste tracking documents. (This tracking system came on-line approximately 1-2 months ago.) Once the drums are accepted, the transporter goes off-site to be weighed. When the transporter returns, he is given his copy of the manifest.

Drums are segregated by hazard class into six bays, each separated by a concrete, six-inch berm and designated as "A" through "E" (the Reactive Bay is not included). The following is a discussion of each bay.

1. Corrosive Bay (Acids) (Bay E)

Approximately 104 containers stacked two-high, mostly with 55-gallon capacity, were in storage (Photo No. 1). All of the containers were closed and had hazardous waste labels. A fire extinguisher is attached to a post between this bay and the Flammable Storage Bay. Toward the rear of the bay was a container with a small glass jar on the lid (Photo No. 2). Bob Gold stated this was a sample from the drum, pulled by one of the drum pad employees, which will be brought to the lab for a treatability test. Located within this bay were eight 55-gallon containers of lab-packed waste with March 27, 1991 accumulation dates, rejected by Rollins Environmental in Deer Park, Texas (Photo No. 3). According to Tim Sloan, Deer Park no longer accepts lab-packed wastes for incineration.

During the 1991 DHS CEI, several containers were stored outside of their designated areas. This is a continuing violation for this and other bays during this CEI.

2. Flammable Bay (Bay D)

Approximately 31 containers, stacked two-high, were in storage (Photo No. 4). This bay, according to Tim Sloan, is used for storage of excess flammable waste and to repackage lab-pack wastes from other generators. Repackaging is conducted by first spreading vermiculite on the floor to

collect any spilled waste should it occur. The small containers are then either bulked or repackaged into more efficient lab-packs. Empty containers were on the ground in a pile of vermiculite (Photo No. 5). The empty containers will be lab-packed, according to Tim Sloan. A compactor is also located within this storage bay (Photo No. 6). The compactor is generally used for waste-contaminated clothing, rags, empty containers, etc. According to Tim Sloan, Oil Process significantly decreases the volume of waste (number of containers) shipped off-site for incineration or land disposal by compacting the waste first.

In front of the acid corrosive bay and this bay, within the loading/unloading area were seven fiber drums labeled as Hazardous Waste, Flammable Solids, with Oil Process as the generator. Tim Sloan stated these containers were repackaged from off-site generated lab-pack wastes that were accepted as flammable liquids. The flammable liquid portion was bulked and either treated on-site or shipped off-site for incineration. Any sludge or solid portion of the wastes are lab-packed into the fiber drums for incineration at the Rollins Environmental facilities in Deer Park, Texas, or Baton Rouge, Louisiana.

Also, twenty-five empty fiber drums with plastic liners had been prepared to be used by the drum pad employees to lab-pack wastes (Photo No. 7).

3. Flammable Bay (Bay C)

Approximately 120 containers were stacked two-high in this storage bay. In the right front corner of the bay, a pallet of containers on the top stack were leaning precariously (Photo Nos. 8 and 9). Eighteen 55-gallon containers were marked in Oil Process code for repackaging (Photo No. 10). Three empty 55-gallon containers were stacked on top of four overpack drums. The 55-gallon containers were in poor condition (Photo No. 10). Tim Sloan stated that the 55-gallon containers probably were originally transported to Oil Process in the over-pack containers. An inventory sheet attached to the container indicated that this was the case. Four fiber drums and 15 smaller containers stacked two-high of lab-packed wastes were located in front of the bay (Photo No. 11).

During the 1991 DHS CEI, this bay was used for waste corrosives, thermal aspirators, oxidizers, and California-only regulated wastes and used for unloading incoming containers because it is next to the bay for repackaging (Bay D). They also observed that several containers were open. During this CEI, it appeared that Oil Process had corrected the open container violation.

4. Corrosive Bay (Bases) (Bay B)

Approximately 140 containers (mostly 55-gallons) were in storage in this bay (Photo No. 12). Although this bay was designated for corrosive (basic) wastes, several containers of flammable liquid, flammable solids, and cyanide wastes were also stored here (Photo No. 13). In addition, eight 55-gallon containers of waste acid, generated by the EPA under manifest #90376507, were also in storage (Photo No. 12). These containers were also marked with Oil Process' code for acid waste ("CLA" for Corrosive Liquid Acid). This was brought to the attention of the Drum Process Manager, Chris Lilley, who immediately instructed the drum pad employees to remove the acid waste containers from this bay and transport them to the acid corrosive bay. When the inspectors returned from their lunch break, it was observed that the drum pad employees had pulled out many containers from this bay and temporarily placed them in front of the Drum Storage Pad in order to remove the flammable and acid wastes and put them in the appropriate storage bays.

During the 1991 DHS CEI, several containers lacked hazardous waste labeling, and were left open. This appears to have been corrected for this CEI.

5. Reactive Bay

The storage area for reactive wastes is an enclosed metal shed with two separate bays; one labeled "East" and one "West" (Photo No. 14). The shed has built-in secondary containment and is also within the bermed Drum Storage Pad. The "East" bay was empty, but the "West" bay held approximately 26 containers of oxidizer waste, most of which were less

than 55-gallon capacities. Outside of the drum pad, on the east side and in front of the Poison Bay, were eight containers of waste to be shipped to Chemical Waste Management in Kettleman City to be landfilled (Photo No. 15).

6. Poison Bay (Bay A)

Located behind the reactive waste shed is the poison waste bay with approximately 66 containers of waste Poison B, flammables, asbestos, lab-packs, and oxidizers, stacked two-high. Ten of these containers held waste hydrogen peroxide, an oxidizer, generated by Rockwell International Manifest #90375303, stacked on top of containers of Poison B waste generated by Benmatt Industries under manifest #89669018 (Photo No. 16).

During the DHS 1991 CEI, this bay had inadequate aisle space. Aisle space appeared to be in compliance during this CEI.

Back Pad

Located behind and to the east of the Drum Storage Pad is an area referred to by Oil Process personnel as the Back Pad. According to Tim Sloan, this area is used as a staging area for crushing empty drums with a portable drum crusher. An existing permitted roll-off container storage area, consisting of a concrete pad and secondary containment walls capable of holding 12,595 gallons, is located within this area. The roll-off containers were covered. Hazardous waste labels were placed in plastic sheeting and attached to the containers (Photo No. 17). One of the containers was labeled "spent carbon" and had an August 29, 1991, accumulation date. This area will be replaced (as specified in their permit) with a rail transfer station that can accommodate two 20,000-gallon tank cars.

Four additional roll-off containers, two larger than the others, were labeled with hazardous waste labels and covered (Photo No. 18). The two larger containers held crushed drums. One of the smaller containers was empty, and the other was labeled "contaminated soil." The latter roll-off container was marked with Oil Process' code for waste solids to be landfilled. Bob Gold stated that the container was mislabeled and was actually waste filter cake. None of these

containers were within any secondary containment. (This condition was also observed during the 1991 DHS CEI.)

Next to the roll-off containers, along the fence line, were 58 containers, 46 of which were delivered to Oil Process that morning by Chem Pak, another subsidiary of Rollins Environmental using Oil Process as a transfer station (Photo No. 19). Of the remaining 12 containers, 11 were "process wastes" according to Bob Gold, that were removed from a truck trailer. One container had a hazardous waste label which designated Oil Process as the generator. Bob Gold and Tim Sloan did not know how or why this container was there.

Five truck trailers were also located in the Back Pad area. Bob Gold and Tim Sloan opened the trailers in order for them to be inspected. Three of the trailers were Chem Pak's waste shipments using Oil Process as a transfer station (Photo No. 20). One of the trailers was holding waste containers to be shipped for incineration on September 30, 1991. The last trailer contained approximately 40 containers of waste flammables that had been rejected by Rollins Environmental in Deer Park, Texas, due to a high concentration of lead. The waste was received by Oil Process on September 23, 1991. Tim Sloan stated they were going to reanalyze the waste to determine the source of the lead.

During the 1991 DHS CEI, ten truck trailers were in this area, all using Oil Process as a transfer facility; however, the wastes had been in storage for at least 30 days (exceeding the limitation of 144 hours). Two of the trailers had very strong odors, one of which was similar to paint solvents. Another trailer containing flammable liquids was stored 30 feet from the property boundary.

Located adjacent to the site of a partially constructed, temporary drum storage building were approximately 120 55-gallon containers of flammable waste which were being bulked and will be moved to the truck trailers and shipped off-site on Monday, September 30, 1991 (Photo No. 21).

Wastewater Treatment Tanks

Oil Process treats aqueous waste with metals and alkaline liquid wastes with metals and cyanide in 4,500-gallon to 8,000-gallon batches under authority of

their current hazardous waste permit. The existing treatment system consists of 12 tanks and a final filter press and activated carbon absorption. A water layer is maintained in each tank to keep the monitoring probes wet. Prior to any treatment, the water in the tank is analyzed by the on-site laboratory. A sample is pulled from the drums of waste and a compatibility test is run. Desmond Phillips, Treatment Process Manager, explained the treatment activities.

Six horizontal tanks, V-1 through V-6, are used to conduct the treatments. Tank V-1 has a 10,000 gallon capacity and is the receiving tank if the wastestream requires acid neutralization or hexavalent chrome reduction. Tank V-2 has a 10,000 gallon capacity and is the receiving tank if the wastestream requires basic neutralization or cyanide treatment. Sludge collected from the treatment activities in Tanks V-1 and V-2 are collected in Tank V-3 with a 10,000 gallon capacity for separation. (See Photo No. 22 for the above three tanks.) The sludge from Tank V-3 is pumped through a clarifier and then to the filter press with a 60 cubic foot filter cake capacity. A roll-off box for the waste filter cake is placed underneath the press and behind a locked containment. According to Desmond Phillips, only he and Justine Gutierrez, the Operations Manager, have a key to the roll-off box.

During the 1991 DHS CEI, Oil Process was not able to track the generators' manifest numbers for the wastestreams eventually included in the filter cake. In response, Oil Process have implemented a maintenance log for the roll-off box referred to as the Filter Cake Log in which the wastestreams, generators, batch numbers, and manifest numbers are recorded. When the roll-off box is full, it is hauled to Chemical Waste Management in Kettleman City for land disposal.

After treatment, another sample is taken of the treatment tanks. If treatment is complete, the filtrate from the filter press and wastewaters that did not require filtering are pumped to Tank V-4 for storage prior to being pumped to Tank V-8. Tank V-8 is a 100,000-gallon capacity treated water holding tank also referred to as the carbon feed tank. Wastewater in Tank V-8, according to Desmond Phillips, would meet the discharge requirements imposed by the Los Angeles Sanitation District for the treated wastes; however, it is still high in total organics. Therefore, the wastewater is pumped from Tank V-8 to a secondary clarifier (in-ground settling tank) and then to an activated carbon absorption

system. From there, the effluent is pumped into an effluent water check tank, Tank V-5. Tank V-5 has an operating capacity of 8,200 gallons and is equipped with a high-level alarm and an automatic shut-off. When Tank V-5 has reached its capacity, it is analyzed again by the on-site laboratory for the Oil Process discharge requirements (Attachment 7), and if the wastewater meets the criteria, it is discharged into the sewer. A log is maintained by Desmond Phillips for each sewer discharge event, in which the date, time, and volume of wastewater discharged is recorded. According to Desmond Phillips, only he and Justine Gutierrez have a key to the sewer discharge point. The spent carbon is manifested to Rollins Environmental in Deer Park, Texas, for incineration.

Tank V-6, next to Tank V-4, is a standby tank used for further clarification of the liquid wastes and sometimes used for truck washing. This tank was posted with an NFPA placard that indicated the waste was corrosive, when in fact, it was not (Photo No. 23).

Tank V-9 is currently out of service. It has been used as a holding tank for unclarified wastewaters and rainwater. Tank V-10 is a 20,000-gallon capacity, upright tank located adjacent to the filter press and is used as an oil water/slop separation tank. This tank was recently moved to be at least 50 feet from the property boundary.

The treatment system is also equipped with a closed-vent, vapor recovery system. Vapors from Tanks V-1, V-2, and V-3 are pumped to a caustic scrubber. The scrubber is maintained to hold greater than .5 inches of water, at least 30 gallons per minute, and at a pH of approximately 11. Vapors from the filter press area and the truck wash-out area are pumped to the carbon absorption unit and then to the caustic scrubber. Vapors from Tanks V-4, V-5, V-6, V-8, V-9, and V-10 are pumped to the thermal oxidation tank (fume incinerator). If the thermal oxidation system is not on-line, the vapors are diverted to the carbon absorption unit.

Oil Process plans to close the existing tanks and install 58 new carbon steel and polyethylene or fiberglass tanks.

On-Site Laboratory

The On-Site Laboratory is located in two portable trailers. One trailer houses the waste analyses records and analytical equipment for VOC, VOX, Pesticide Scan, PCB Scan, TPH, and ion chromatization for anions and cations. The other trailer is equipped with an ICP and AA for analysis of heavy metals, UV for hexavalent chrome, and GC/MS for organics. Oil Process was recently certified by the DTSC for TCLP. Alan Ahmadi, the lab manager, described the lab operations. He stated that waste reagents are poured down the drain which is hooked to the in-ground clarifier. The waste reagents are then be treated by thermal oxidation and eventually shipped for incineration. Alan Ahmadi stated that after a sample has been analyzed for treatability, the remaining portion is returned to the original container. Samples are stored in a metal locker outside of the lab trailer. Alan Ahmadi stated that samples are stored for a maximum of 90 days; however, a sample jar dated June 17, 1991, was in storage. Tim Sloan advised Alan Ahmadi to dispose of the sample. Two plastic trash cans had hazardous waste labels but contained trash (paper) and used pipettes.

DOCUMENT REVIEW

Documentation was reviewed in the laboratory, in Bob Gold's office, in Desmond Phillips' office, and in Victoria Valliere's office. A discussion of the documents is presented below.

Waste Analyses

The waste analyses were reviewed during the tour of the on-site laboratory. Waste analyses from several generators were reviewed. Oil Process usually composites samples if the volume from the original wastestream is greater than 275 gallons.

Manifests and LDR Notifications

The inspectors reviewed a random sampling of the 1991 manifests and associated LDR notifications maintained by Bob Gold. When a shipment of waste is received, Bob Gold reviews the manifest, and, after the lab results are in, and if the

waste is accepted, Bob Gold signs the manifest for Oil Process. A copy of the manifest is given to Chris Lilley for his tracking, and another is put in the file. Casandra Vargas, assistant to Bob Gold, is given the original in order to input the information in a database. All of the incoming manifests and LDR notifications appeared to be complete and in compliance.

A review was also conducted of manifests for Oil Process-generated wastes. One manifest, Texas Manifest #00401772, was for waste shipped to Rollins Environmental in Deer Park, Texas, on April 10, 1991. The manifest was signed by Rollins Environmental on June 10, 1991, originally dated May 30, 1991, but crossed out (Attachment 3). Line 32 of the manifest (special handling) states that one drum was rejected due to it being a nonconforming lab-pack. When Tim Sloan and Bob Gold were asked about this, they stated that Rollins would not sign the manifest until the lab-pack issue was resolved.

Closure Cost Estimates/Financial Assurances

Tim Sloan provided the inspectors with a faxed copy of Oil Process' Certificate of Insurance dated August 3, 1990. The policy includes $10 million for Pollution Legal Liability (Non-Sudden Acc. Pollution) effective November 4, 1989 through November 4, 1990, through National Union (Attachment 8). However, upon review of the EPA files, a letter from Oil Process to DHS on December 20, 1990 indicated that Oil Process had received a new liability insurance policy for non-sudden accidental occurrences for $10 million annual aggregate, and sudden accidental occurrences with a limit of $5 million per occurrence and $5 million annual aggregate. The policy became effective on December 1, 1990 (Attachment 8).

Drum Inventory Waste Tracking

Chris Lilley is responsible for managing the drum pad. When a drum is received, it is assigned drum identification and batch numbers. Chris Lilley maintains a tracking log for each container of waste transported to Oil Process, which includes the generator name, drum identification number, volume, its type of treatment or handling (regarding repackaging, treatment), disposition of waste (i.e., type of treatment, landfill, incineration, thermal oxidation), batch number, and handling date. Attachment 4 is a tracking document for 141 fiber

drums generated by Watsons Lab (consisting mainly of birth control pills). The Oil Process drum numbers run from 1701 to 1841. Oil Process repackaged the containers on September 20, 1991 and disposed of only 85 containers. As of August 12, 1991, all of this information had been input into a computer. Prior to August 12, all of this was recorded in a bound logbook. Currently, Chris Lilley does not have the outgoing manifest numbers in the computer database, and it is difficult to locate them; however, the information is recorded on the hard copies.

Treatment Tracking

Desmond Phillips maintains numerous tracking logs for the treatment tank area. A receiving log records each bulk load and drum brought to the treatment area and includes the date, manifest number, volume, Oil Process sample identification number, generator, batch number, and the tank in which the wastestream was received. A batch sheet records each wastestream in a particular batch. A log is maintained for each discharge to the sewer that includes the date, time, and volume of the discharge, and another log is maintained for each wastestream comprising a filter cake which includes each generator, manifest number, batch number, and roll-off box number.

Inspection Logs

Inspection logs for the treatment tank area were reviewed in Desmond Phillips' office. They appeared to be complete and in compliance with their permit and the regulations. The inspection logs of the drum pad were reviewed in Chris Lilley's office. Daily inspections of the drum pad are conducted by one of the drum pad employees. The inspections were occurring daily and the logs appeared to be in compliance with Oil Process' permit and the regulations. Each item to be inspected is marked either "yes" or "no." A "no" indicates a problem requiring corrective action. Often, the remedial action is recorded next to the line and "yes" is circled. On several occasions, the item was circled "yes" that no problem existed; however, after Chris Lilley conducted his own inspection, he changed the log to "no" and dated and initialed the change. For the past several weeks, the item for segregation of drums by hazard class was identified as requiring remedial action. This problem was evident to the inspectors during the

site tour. Attachment 5 consists of the inspection logs for September 23 and 24, 1991, conducted by Alan Dixon, showing the method of indicating remedial actions taken and Chris Lilley's notations.

According to Chris Lilley, he tries to inspect the drum pad against the Drum Inventory Log. He highlights on the log each drum still on the drum pad. If a drum is not highlighted, it probably means it had been processed and Chris Lilley will determine the drum's final disposition.

Maintenance Records

Desmond Phillips has been designated for tracking the maintenance needs and repairs of non-emergency equipment for the entire facility. These records appeared complete and up-to-date. Victoria Valliere, Health and Safety Manager, maintains the emergency equipment inspection and maintenance logs. These appeared complete and up-to-date.

Training Records

Training records are maintained by Victoria Valliere. On the day of this inspection, Oil Process was conducting a fire extinguisher training. She stated that all employees receive 40-hour OSHA training and medical monitoring prior to being allowed on-site. In addition, each employee receives formal on-the-job training. Attachment 6 is a memorandum from Chris Lilley to Juan Beaver and Alan Dixon, dated December 3, 1990, regarding a 12-week on-the-job training schedule through February 28, 1991. Annual 8-hour OSHA refresher training is usually conducted on-site in June and November. In addition, each section conducts monthly tailgate meetings. Supplemental training is provided for the Emergency Response Team. All of the records appeared to be complete and up-to-date.

Contingency Plan

Victoria Valliere maintains incident reports. She stated that Oil Process has not implemented their contingency plan.

POTENTIAL VIOLATIONS

40 CFR Part 264.177(c)	Oil Process stored eight 55-gallon containers of waste acid in the storage bay designated for basic wastes. In addition, these containers were in close proximity to containers of cyanide waste (Photo No. 12).
Hazardous Waste Facility Permit, Part IV.A.	Oil Process stored hazardous waste in containers at the existing drum storage pad in excess of 7,480 gallons (approximately 136 55-gallon drums) (Photo Nos. 1 through 16).

LIST OF ATTACHMENTS

1. Generator's Checklist
2. Photograph Log and Photographs
3. Texas manifest #00401772
4. Tracking log for 141 containers of waste from Watsons Lab
5. Drum Pad Inspection Logs for September 23 and 24, 1991
6. Memorandum: Chris Lilley to Juan Beaver and Alan Dixon, December 3, 1990, Re: 12-week on-the-job training schedule through February 28, 1991.
7. Los Angeles Sanitation District Wastewater Discharge Requirements
8. Financial Assurances dated August 3, 1990 and December 1, 1990

ATTACHMENT 1

Generator's Checklist

GENERATORS OF HAZARDOUS WASTE
CEI CHECKLIST

For Facilities which only Generate,
and Do Not Treat, Store, or Dispose of Hazardous Waste

SITE ID#: CAD050806850 INSPECTION DATE: September 25, 1991

SITE NAME: Oil Process Company

LOCATION: 5756 Alba Street

Los Angeles (City) CA (State) 90058 (Zip Code)

LEAD INSPECTOR: Julie Anne Poust OFFICE: SAIC/TSC-SF

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	D1 CONTINGENCY PLAN & EMERGENCY PROCEDURES
	I1 USE AND MANAGEMENT OF CONTAINERS
	~~J1 TANKS~~
266:	
	~~G1 RECYCLABLE MATERIALS USED IN A MANNER CONSTITUTING DISPOSAL~~
	~~D1 HAZARDOUS WASTE BURNED FOR ENERGY RECOVERY~~
	~~E1 USED OIL BURNED FOR ENERGY RECOVERY~~
	~~F1 RECYCLABLE MATERIALS UTILIZED FOR PRECIOUS METALS RECOVERY~~
	~~G1 LEAD-ACID BATTERIES RECLAMATION~~
268:	LAND DISPOSAL RESTRICTIONS

Also Completed: Transporter ___

LINE OUT ITEMS NOT APPLICABLE TO THIS FACILITY.

Updated to include final and published revisions of 40 CFR through 9/30/90.

Facility Representatives:

Tim Slean
Bob Gold
Chris Lilley
Victoria Valliere
Desmond Phillips

Other Inspectors:

Nancy Carder - DTSC
Andy Bajda - DTSC

Documents Copied or Requested:

Areas Present / Inspected:

Drum Pad
Back Pad
New temporary drum pad
wastewater treatment tanks
Laboratory

Facility Recipient of Report: Tim Slean

Mailing Address (if different):

Generators - General:
(Part 261 Subpart A and Part 262 Subpart A)

	Yes	No	Comments
90-Day Storage			
If the generator does not have interim status (as TSD storage facility), have they accumulated HW on-site for less than 90 days? 262.34(a)			Facility has permit to Store waste
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	✓		
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	✓		
Has the generator complied with requirements for owners/ operators in Subparts C and D of Part 265, with 265.16 and with 268.7(b)(4)? 262.34(a)(4)	✓		
If the generator has stored HW on-site for more than 90 days*, have they:			
Been granted an extension from EPA? or:			NA
Complied with the 40 CFR Parts 264 and 265 and the permitting requirements in Part 270 of RCRA?	✓		
Has the generator of solid wastes made a HW determination by determining if the waste is: 262.11			
(a) Excluded from regulation under 261.4?	✓		
(b) Listed as a HW in 261 Subpart D?	✓		

Generators - General: - Continued
(Part 262 Subpart A)

	Yes	No	Comments
Has the generator of solid wastes made a HW determination by determining if the waste is: 262.11 (continued)			
(c) For purposes of compliance with Part 268, or if the waste is not listed in Part 262, Subpart D, has the generator determined if the waste exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	✓		
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	✓		
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	✓		

NOTE: The disposal of the following PCB wastes and materials are exempt from regulation under Parts 261 through 265, and Parts 268, 270, and 124 and the notification requirements of Section 3010 of RCRA: 261.8

(1) PCB-containing dielectric fluid and electric equipment containing such fluid authorized for use and regulated under Part 761 of 40 CFR; and that

(2) Are hazardous only because they fail the test for the toxicity characteristic (hazardous waste codes D018 through D043 only).

Recyclable Materials

If the wastes are any of the following recyclable materials, also complete Part 266 Subparts C-G. 261.6(a)(2)			
(i) Those used in a manner constituting disposal (Subpart C)?		✓	
(ii) HW burned for energy recovery in boilers and industrial furnaces not regulated as an incinerator (Subpart D)?		✓	
(iii) HW characteristic used oil that is burned as above (Subpart E)?		✓	
(iv) Those from which precious metals are reclaimed (Subpart F)?		✓	
(v) Spent lead-acid batteries that are reclaimed (Subpart G)?		✓	

Manifests:
(Part 262 Subpart B)

	Yes	No	Comments
General Requirements: 262.20-			
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	✓		
(b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	✓		
(c) Has the facility designated an emergency alternate facility? or:	✓		
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	✓		
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is located? or, if not provided by that state:	✓		
(b) Where the generating facility is located?	✓		
(c) If not provided by either state, the EPA form from another source?			NA
Did the manifest consist of enough copies? 262.22	✓		
Did the generator: 262.23(a)			
(1) Sign the manifest by hand?	✓		
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	✓		
(3) Keep one copy of the manifest (per 262.40(a))?	✓		
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	✓		

Manifests:
(Part 262)

	Yes	No	Comments
Manifests: Continued-			
If the shipment was sent by water or rail, did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c), -(d)	___	___	NA
For hazardous waste shipments to a facility in an authorized state, which is not yet authorized to regulate that waste as hazardous, has the generator: 262.23(e)			
1) Confirmed that the facility receiving the waste agrees to sign and return the manifest to the generator?; and	___	___	NA
2) Confirmed that any out-of-state transporter signs and forwards the manifest to the designated facility?	___	___	↓

Pre-Transport Requirements:
(262 Subpart C)

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	✓		
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31	✓		
Are containers marked in accordance with DOT regulations (49 CFR 172.101)? 262.32(a) including:	✓		
Proper shipping name [table column 2]?	✓		
Proper ID number [table column 3A]?	✓		
Proper ORM designation for containers of ORM-A,B,C,D, or E wastes?	✓		
Are containers of 110 gallons or less marked with the following words: 262.32(b)			
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address _____	✓		
Manifest Document Number _____	✓		
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33			Not evaluated

Record Keeping and Reporting:
(Part 262 Subpart D)

Are the following kept for at least three years:	Yes	No	Comments
(a) Manifest signed by the receiving facility?	✓		
(b) Biennial Reports and Exception Reports?	✓		
(c) Test results, waste analysis or other determinations made in accordance with 262.11?	✓		
Biennial Report:			
If the facility has shipped any waste off-site to a U.S. TSD, have they submitted a Biennial Report to the RA by March 1 of each even numbered year? 262.41(a)	✓		
Was the report submitted on EPA Form 8700-13A and cover generator activities during the previous calendar year? 262.41(a)	✓		
Does the report include the following information: 262.41(a)-			
(1) EPA ID No., name and address of the generator?	✓		
(2) Calendar year covered by the report?	✓		
(3) The EPA ID No., name, and address for each off-site U.S. TSD to which HW was shipped during the year?	✓		
(4) Name and EPA ID No. of each transporter used during the year to ship to a U.S. TSD?	✓		
(5) Description, EPA HW No., DOT hazard class and quantity of each HW shipped off-site to a U.S. TSD?	✓		
(i) Was this information listed by EPA ID No. of each off-site U.S. TSD to which HW was shipped?	✓		

Exports of Hazardous Waste:
(Part 262 Subpart E)

	Yes	No	Comments
Exports of HW are prohibited unless: 262.52-			
(a) Notification (262.53) has been provided?	___	___	_____
(b) The receiving country has consented to accept the waste?	___	___	_____
(c) A copy of the EPA Acknowledgement of Consent accompanies the shipment, and is attached to the manifest or shipping paper?	___	___	_____
(d) The HW shipment confirms to the receiving country's written terms in the EPA Acknowledgement of Consent?	___	___	_____
Did the primary exporter of HW notify the EPA each calendar year of intended exports? 262.53(a)	___	___	_____
Was the notice signed by the primary exporter include his name and address and the following information, by consignee, for each HW type: 262.53(a)(1, (2)-			
(i) A description of the HW, the EPA waste ID No. and the DOT shipping description (40 CFR 171-177)?	___	___	_____
(ii) The estimated frequency & time span of exportation?	___	___	_____
(iii) The estimated total quantity?	___	___	_____
(iv) All points of entry to and departure from each foreign country the HW will pass through?	___	___	_____
(v) How the waste will be transported (types of vehicles and containers)?	___	___	_____
(vi) A description of how the waste will be treated, stored, or disposed of in the receiving country?	___	___	_____
(vii) The name and site address of the foreign consignee(s)?	___	___	_____
(viii) The name of each country the HW will pass trough, for how long it will remain there, and how it will be handled during that time?	___	___	_____

Record Keeping and Reporting: - Continued
(Part 262 Subpart D)

	Yes	No	Comments
(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?	✓		
(7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)?	✓		
(8) The signed certification?	✓		
Exception Reporting: 262.42(a)-			
(1) For a generator of more than 1000 kg/mo. that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the HW?	✓		
(2) For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to the RA?			not determined
Did the Exception Report include: 262.42(a)-			
(i) A legible copy of the manifest?			
(ii) A signed cover letter explaining the efforts taken to locate the HW and the results of those efforts?			

General Facility Standards:
(Part 265 Subpart B)

	Yes	No	Comments
Does the facility have a HW personnel training program? 265.16(a)(1)	✓		Approved in current permit
Is it directed by a person trained in HW management procedures? 265.16(a)(2)	✓		Victoria Vallieve directs prose
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	✓		Fire Extinguisher training occur during this CEI
(i) Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment?	✓		
(ii) Key parameters for automatic waste feed cut-off systems?	✓		
(iii) Communication or alarm systems?	✓		
(iv) Response to fire or explosions?	✓		
(v) Response to ground water contamination incidents?			NA
(vi) Emergency shutdown of operations?	✓		
Are new personnel supervised until training is completed? 265.16(b)	✓		
Do new personnel complete the training within 6 months? 265.16(b)	✓		
Do personnel take part in an annual review of the initial training? 265.16(c)	✓		
Do personnel training records include for each HW position: 265.16(d)-			
(1) Job title and name of person filling the position?	✓		
(2) Job Description?	✓		
(3) Description of required HW training?	✓		

General Facility Standards: - Continued
(Part 265 Subpart B)

	Yes	No	Comments
(4) Documentation that HW training or job experience required has been completed?	✓		
Are training records kept for current employees until closure, and past employees for at least 3 years? 265.16(e)	✓		

Preparedness and Prevention:
(Part 265 Subpart C)

	Yes	No	Comments
Location Standards:			
The facility did not place HW in a salt dome, salt bed formation, underground mine or cave?	✓		
Is the facility maintained and operated to minimize the possibility of fire, explosion, or releases of HW or HW constituents to air, soil, surface water which could threaten human health or the environment? 265.31	✓		
Does the facility have the following equipment where applicable: 265.32-			
(a) Internal communications or alarm system capable of providing immediate emergency instruction?	✓		
(b) Telephone or 2-way radios at the scene of operation?	✓		
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?	✓		
(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?	✓		
Does the facility test and maintain all emergency equipment in operable condition? 265.33	✓		
Do personnel in areas where HW is being handled have immediate access to internal alarm or communication systems, or voice or visual contact with another employee? 265.34(a)	✓		
Can personnel that operate the facility while alone immediately access external emergency assistance? 265.34(b)	✓		

Preparedness and Prevention - Continued
(Part 265 Subpart C)

	Yes	No	Comments
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35	✓		
Arrangements With Local Authorities:			
Has the facility attempted to make the following arrangements/agreements:			
Familiarize police, fire dept., and emergency response teams with HW operations? 265.37(a)(1)	✓		
Designate primary emergency authority? 265.37(a)(2)	✓		
With state emergency response team, contractors and equipment suppliers? 265.37(a)(3)	✓		
Familiarize local hospitals with the properties of HW and the types of potential injuries and illnesses from exposure to HW? 265.37(a)(4)	✓		
Did the facility document in the operating record any refusal by state or local authorities to enter into such arrangements? 265.37(b)			NA

Contingency Plan and Emergency Procedures:
(Part 265 Subpart D)

	Yes	No	Comments
Does the facility have a contingency plan designed to minimize hazards from fires, explosions, or any unplanned releases of HW or HW constituents? 265.51(a)	✓		Approved in current permit
Does the plan describe actions personnel must take to comply with 265.51 and 265.56 responses? 265.52(a)	✓		
Does the plan describe the arrangements agreed to in 265.37? 265.52(c)	✓		
Does the plan list the current names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators? 265.52(d)	✓		
Does the plan name one person as primary emergency coordinator and list any others in order of responsibility? 265.52(d)	✓		
Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability? 265.52(e)	✓		
Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes? 265.52(f)	✓		Posted throughout facility
Is the plan maintained at the facility? 265.53(a)	✓		
Has the plan been submitted to all local emergency organizations that may be called upon in responses? 265.53(b)	✓		

Contingency Plan and Emergency Procedures: - Continued
(Part 265 Subpart D)

	Yes	No	Comments
Has the plan been reviewed and immediately amended whenever: 265.54-			
(a) Applicable regulations are revised?			NA (as of May 1990 when permit issued)
(b) The plan fails in an emergency?			
(c) Facility changes required it?			
(d) The list of emergency coordinators changes?			
(e) The list of emergency equipment changes?			
Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55	✓		
Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55	✓		
Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55	✓		
If an emergency situation has occurred at this facility, did the emergency coordinator (EC) immediately:			
Activate alarm systems? 265.56(a)(1)			NA
Notify the appropriate response agencies? 265.56(a)(2)			
Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)			
Assess the possible direct and indirect hazards from the release, including gases and run-off of fire fighting materials? 265.56(c)			

Contingency Plan and Emergency Procedures: - Continued
(Part 265 Subpart D)

	Yes	No	Comments
If assessment indicates the release could threaten harm outside the facility, does the EC: Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide? 265.56(d)(1)	___	___	NA
Immediately notify either the government on-scene coordinator or the National Response Center's toll-free line at 800/424-8802? 265.56(d)(2)	___	___	
Did the report include: 265.56(d)(2)-			
(i) The name and phone # of the reporter?	___	___	
(ii) Name and address of the facility?	___	___	
(iii) Time and type of incident?	___	___	
(iv) Name and quantity of materials involved to the extent known?	___	___	
(v) The extent of any injuries?	___	___	
(vi) The possible hazards to the outside area?	___	___	
During the emergency, does the E.C. take all reasonable measures to minimize the release? 265.56(e)	___	___	
If the facility had to stop operations to respond, does the E.C. monitor all appropriate equipment? 265.56(f)	___	___	
After the emergency, does the EC immediately provide for the TSD of recovered or contaminated material resulting from the release? 265.56(g)	___	___	

Contingency Plan and Emergency Procedures: - Continued
(Part 265 Subpart D)

	Yes	No	Comments
Does the EC ensure that in the affected areas of the facility: 265.56(h)-			
(1) Wastes incompatible with the released material are not handled until after clean-up is complete?	___	___	NA
(2) All emergency equipment is clean and fit for use before operations resume?	___	___	
Does the facility notify the R.A., state and local authorities that the above has been done before resuming operations in affected areas? 265.56(i)	___	___	
If the contingency plan has been implemented:			
Did the operating record include the date, time, any details of each incident that required implementation of the contingency plan? 265.56(j)	___	___	NA
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	___	___	
Did the report include: 265.56(j)-			
(1) Name, address and phone # of the owner or operator?	___	___	
(2) Name, address, and phone # of the facility?	___	___	
(3) Date, time, and type of incident?	___	___	
(4) Name and quantity of materials involved?	___	___	
(5) The extent of any injuries?	___	___	
(6) A hazard assessment?	___	___	
(7) An estimate of the quantity and disposition of recovered material?	___	___	

Use and Management of Containers:
(Part 265 Subpart I)

	Yes	No	Comments
A generator may accumulate HW on-site for 90 days or less without having a permit or interim status, provided that the waste is placed in containers that comply with the interim status requirements (Subpart I). Does the facility also comply with the Preparedness and Contingency Plan requirements of Subparts C and D?	✓		
Does the facility transfer HW from containers not in good condition or leaking to containers in good condition? 265.171	✓		
Are containers compatible with the HW stored in them? 265.172	✓		
Are containers stored closed? 265.173(a)	✓		
Are containers managed to prevent rupture or leakage? 265.173(b)	✓		
Are containers inspected weekly for leaks and deterioration? 265.174	✓		
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176	✓		
Are incompatible wastes stored in separate containers? 265.177(a)	✓		
Is HW not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)	✓		
Are containers holding HW that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)		✓	Addressed in the permit requirement (264.177) for the drum storage pad.

Use and Management of Containers: - Continued
(Part 265 Subpart I)

	Yes	No	Comments
Are containers or inner liner that are not empty managed as HW? 261.7(a)(2)	✓		
For a container to be considered empty, the facility must ensure that no more remains than: 261.7(b)(1)-			
(i) Can be removed by conventional means (e.g., pouring, pumping, etc.)? and:	✓		
(ii) One inch of residue on bottom of container or inner lining? or:	✓		
(iii) (A) If the container is not over 110 gallons in size, 3% of weight when full?			NA
(iii)(B) If the container holds over 110 gallons, no more than 0.3% of weight when full? or:	✓		
If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2)			NA
If a container (or liner removed from the container) has held an acute HW, it is empty if: 261.7(b)(3)-			
(i) It has been triple rinsed using a solvent capable of removing the contents?	✓		
(ii) Cleaned by another proven removal means? or:			NA
(iii) For the container, the liner prevented contact and has since been removed?			↓

See also 265.31 (p. C1).

ACCUMULATION AREAS & CONTAINERS

Names of accumulation areas

No accumulation areas were present during this CEI.

Accumulation if Less than 55 gallons

The generator may accumulate at or near the point of initial generation up to 55 gals of H.W., or one quart of acutely hazardous waste, provided:

The containers are marked either with the words "Hazardous Waste" or labels that identify the contents? 262.34(c)(1)(ii)

AND

The containers are in good condition 265.171.

AND

The containers are compatible with the waste 265.172.

AND

The containers are stored closed 265.173(a).

AND

The containers must not be opened, handled or stored in a manner which may rupture the container or cause it to leak 265.173(b).

Accumulation if greater than 55 gallons

Are containers visibly marked with:

The date that the waste accumulation started? 262.34(a)(2)

The words "hazardous waste"? 262.34(a)(3)

If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a).

	Names of accumulation areas
Does the generator comply with the requirements of 40 CFR Part 265: Subpart I for the use and management of containers listed below. 262.34(a)(1)	NA
Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition? 265.171.	
Are containers compatible with the H.W. stored in them? 265.172.	
Are containers stored closed? 265.173(a).	
Are containers managed to prevent rupture or leakage? 265.173(b).	
Are containers inspected weekly for leaks and deterioration? 265.174.	
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176.	
Are incompatible wastes stored in separate containers? 265.177(a).	
Is H.W. not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b).	
Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c).	
Does the generator comply with the requirements with 40 CFR Part 265.37: arrangements with local authorities?	See Main checklist
Does the generator comply with the requirments of 40 CFR Part 265: Subpart D for contingency plan and emergency procedures?	See Main checklist
Does the generator comply with the require-	

	Names of accumulation areas	
Does the generator comply with the requirements of 40 CFR Part 265: Subpart C for Preparedness and Prevention listed below.	NA	
Does the facility have the following equipment where applicable: 265.32-		
(a) Internal communications or alarm system capable of providing immediate emergency instruction?		
(b) Telephone or 2-way radios at the scene of operation?		
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?		
(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?		
Are the systems and equipment listed above tested? 265.33.		
Do all personnel have immediate access to the systems and equipment listed in 265.32 (a)-(d)?		
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35.		

Tanks:
(Part 265 Subpart J)

	Yes	No	Comments
Are tanks used to store or treat HW exempt from this subpart because they contain no free liquids and are situated inside a building with an impermeable floor? 265.190(a)	___	___	Addressed under permit requirements (264.190)
Are tanks exempt from this subpart because they serve only as part of a secondary containment system? 265.190(b)	___	___	_____

If a 100-1000 kg/mo. generator, see Part 262 checklist.

Are HW or treatment reagents placed in tanks so that they do not cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail? 265.194(a)	___	___	_____
Are controls and practices used to prevent spillage, including: 265.194(b)-			
(1) Spill prevention controls e.g., check valves, dry discount couplings?	___	___	_____
(2) Overfill prevention devices e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank?	___	___	_____
(3) Sufficient freeboard in uncovered tanks to prevent overtopping by wind action, wave, or precipitation?	___	___	_____
Are daily inspections done for the following: 265.195(a)-			
(1) Discharge control equipment e.g., feed cutoff, bypass and drainage systems?	___	___	_____
(2) Corrosion or releases of waste in above ground portions?	___	___	_____
(3) Data gathered from monitoring and leak detection equipment e.g., pressure and temperature gauges, monitoring wells?	___	___	_____

Note: If the primary purpose of this inspection is to evaluate compliance with HW storage tank reg's, complete checklists in OSWER guidance of 7/17/87.

Land Disposal Restrictions:
(Part 268)

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal since its effective prohibition date:* 268.1(b) (See Attachment A for listings)			
F001 through F005 spent solvents?	✓		
F020 through F026-28 Dioxins?		✓	
"California List" wastes?	✓		
First Third scheduled wastes?	✓		
Second Third scheduled wastes?	✓		
Third Third scheduled wastes?	✓		
Exemptions: Are the restricted wastes exempted from land disposal restrictions because:			
They are hazardous only by characteristic and disposed into a non-hazardous or hazardous injection well as defined in Part 144.6(a) and do not exhibit any prohibited characteristic of hazardous waste at point of injection? 268.1(c)(3)		nD	
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)		✓	
The waste is from conditionally-exempt small quantity generators? 268.1(e)(1)		✓	
A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(e)(2)		✓	

*Land disposal means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, or placement in a concrete vault or bunker for disposal purposes. 268.2(c) Injection wells are being covered under a separate schedule (Part 148).

Land Disposal Restrictions:- Continued
(Part 268)

	Yes	No	Comments
EPA has not promulgated land disposal prohibitions or treatment standards for wastes identified or listed as hazardous after November 8, 1984? 268.(e)(3)		✓	
If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.			
Exceptions: Can the restricted wastes continue to be land disposed because:			
A case-by-case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1-4), 268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), 268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)(2nd 3rd), 268.35(i)(4)(3rd 3rd), 268.1(c)(2)		✓	
An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)		✓	
If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.			
Except for characteristic wastes subsequently discharged under NPDES permit or in compliance with pretreatment requirements under Section 307 of the CWA, has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3	✓		Most wastewaters are pre-treated and disposed to sanitary sewer.

Land Disposal Restrictions:- Continued
(Part 268)

	Yes	No	Comments
Storage:			
Are restricted wastes only being stored where: 268.50-			
(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?	✓		
Generators: Waste Analysis			
If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	✓		
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i)	✓		
Did the generator determine if liquid CA list wastes sludges an solids were CA list liquids? 268.32(j)(1)	✓		
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	✓		
Did the generator determine whether a HW listed in 268.10, -.11, -.12, exceeds the applicable treatment standards specified in 268.41, and -.43 by testing a representative sample of the waste extract or the entire waste, or use knowledge of the waste? 268.35(j)	✓		
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	✓		

Land Disposal Restrictions:- Continued
(Part 268)

Notices, Certifications, and Demonstrations:	Yes	No	Comments
If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	✓		
(i) EPA HW ID number?	✓		
(ii) Appropriate treatment standards and prohibitions?	✓		
(iii) Manifest number for the waste?	✓		
(iv) Available waste analysis data?	✓		
If the waste is determined to be restricted but not required further treatment, has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)			N/A
Did the notification include: 268.7(a)(2)(i)-			
(a) EPA HW ID number?			
(b) Appropriate treatment standards and prohibitions?			
(c) Manifest number for the waste?			
(d) Available waste analysis data?			
Was the following certification signed? 268.7(a)(2)(ii)-			

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

NOTE: If the recipient of the generator's waste is not on the attached list (p. 9) of known land ban facilities, or if an off-site shipment without notification has occurred, indicate the accepting TSD facility on p. 9 for proper follow-up.

Land Disposal Restrictions:- Continued
(Part 268)

	Yes	No	Comments
If the generator's waste is subject to an exemption from a prohibition on the type of land disposal method utilized for such waste (e.g., a case-by-case extension under § 268.5, an exemption under § 268.6, or a nationwide variance), have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)			NA
Did the notice include: 268.7(a)(3)-			
(i) EPA HW ID number?			
(ii) Appropriate treatment standards and prohibitions?			
(iii) Manifest number for the waste?			
(iv) Available waste analysis data?			
(v) The date the waste is subject to prohibitions?			
If a generator is treating prohibited wastes in tanks or containers to meet applicable treatment standards, has a waste analysis plan been developed and implemented which:			
(a) Is kept on-site in the generator's records? 268.7(a)(4)	✓		
(b) Is based on chemical and physical analysis of waste(s) being treated and contains all information to treat waste in accordance with standards, including the selected testing frequency? 268.7(a)(4)	✓		
(c) Was filed with the RA or authorized state a minimum of 30 days prior to treatment? 268.7(a)(4)	✓		
Have wastes shipped off-site complied with notification requirements of 268.7(a)(2)? 268.7(a)(4)	✓		

Land Disposal Restrictions:- Continued
(Part 268)

	Yes	No	Comments
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)			Wastes are analyzed
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)	✓		
If a generator is managing a labpack that contains wastes identified in Part 268. Appendix IV, and wishes to use the alternative treatment standard under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(7)	✓		
Complied with 268.7(a)(5) and (a)(6) and submitted the following certification? 268.7(a)(7)	✓		

I certify under penalty of law that I personally have examined and am familiar with the waste and that the labpack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment.

If a generator is managing a labpack that contains organic wastes specified in Part 268, Appendix V, and wishes to use the alternative treatment standards under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(8)	✓		

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste and that the labpack contains only organic wastes specified in Appendix V to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment.

Land Disposal Restrictions:- Continued
(Part 268)

	Yes	No	Comments
If the facility is a small quantity generator with tolling agreements pursuant to 262.20(e), has it complied with notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(9) and,			NA
Retained a copy, on-site, of notification, certification, and tolling agreement, for at least 3 years after expiration of agreement? 268.7(a)(9)			
Special Rules for Wastes that Exhibit a Characteristic:			
Did the initial generator determine each waste code applicable to the waste pursuant to 268.9(a) and (b)?	✓		
In addition to any applicable standards determined from the initial point of generation, has the characteristic waste that has been land disposed complied with the treatment standards under Part 268 Subpart D? 268.9(c)			NA
Has a notification and certification, required in 268.9(d), been sent to the RA or authorized state for shipment of non-hazardous waste to a Subtitle D facility? 268.9(d)			NA
Did the notification include the following: 268.9(d)(1)			
(i) Name and address of the Subtitle D facility?			

Land Disposal Restrictions:- Continued
(Part 268)

	Yes	No	Comments
(ii) Description of waste as initially generated, including applicable EPA Hazardous Waste Number(s) and treatability group(s)?	___	___	NA
(iii) Applicable treatment standards at initial point of generation?	___	___	↓
Has the certification been signed by an authorized representative and does it state the language in 268.7(b)(5)(i)? 268.9(d)(2)	___	___	NA

ATTACHMENT 2

Photograph Log and Photographs

Photograph Log

All photographs taken by: Julie Anne Poust
Date: September 27, 1991

Photo No. 1: Corrosive Bay (Acids): Approximately 104 containers stacked two-high, in storage. A fire extinguisher is attached to a post between this bay and the Flammable Storage Bay.

Photo No. 2: Corrosive Bay (Acids): Toward the rear was a container with a small sample jar from the drum, to be brought to the lab for a treatability test.

Photo No. 3: Corrosive Bay (Acids): One of eight 55-gallon containers of lab-packed waste rejected by Rollins Environmental in Deer Park, Texas.

Photo No. 4: Flammable Bay: Approximately 31 containers, stacked two-high, were in storage. Note empty fiber drums in background.

Photo No. 5: Flammable Bay: Empty containers on the ground in a pile of vermiculite will be lab-packed.

Photo No. 6: Flammable Bay: A compactor is used for waste contaminated clothing, rags, empty containers, etc.

Photo No. 7: Flammable Bay: Twenty-five empty fiber drums with plastic liners had been prepared to be used by the drum pad employees for lab-pack wastes.

Photo No. 8: Flammable Bay: Approximately 120 containers were stacked two-high in this storage bay. In the right front corner of the bay, a pallet of containers on the top stack was leaning precariously.

Photo No. 9: Flammable Bay: Approximately 120 containers were stacked two-high in this storage bay. In the right front corner of the bay, a pallet of containers on the top stack was leaning precariously.

Photo No. 10: Flammable Bay: Eighteen 55-gallon containers were marked in Oil Process code for repackaging. Also three empty 55-gallon containers in poor condition, stacked on top of four overpack drums, were probably overpacked in these containers.

Photo No. 11: Flammable Bay: Four fiber drums and 15 smaller containers stacked two-high of lab-packed wastes.

Photo No. 12: Corrosive Bay (Bases): Approximately 140 containers were in storage in this bay including eight 55-gallon containers of waste acid.

Photo No. 13: Corrosive Bay (Bases): Several containers of flammable liquid, flammable solids, and cyanide wastes were in storage.

Photo No. 14: Reactive Bay: An enclosed metal shed with two separate bays, "East" and "West," within the Drum Storage Pad. The "West" bay held approximately 26 containers of oxidizer waste.

Photo No. 15: Outside, to the east of the drum pad, and in front of the Poison Bay, were eight containers of waste to be shipped to Chemical Waste Management in Kettleman City to be landfilled.

Photo No. 16: Poison Bay: Approximately 66 containers of waste, stacked two-high, ten of which held hydrogen peroxide, an oxidizer, generated by Rockwell International stacked on top of containers of poisonous waste generated by Benmatt Industries.

Photo No. 17: Back Pad: Two roll-off containers were within secondary containment, and covered. Hazardous waste labels were placed in plastic sheeting and attached to the containers.

Photo No. 18: Back Pad: Four roll-off containers, of which one of the smaller containers was empty, the other labeled as "contaminated soil," however, it was actually waste filter cake.

Photo No. 19: Back Pad: 58 containers, 46 of which were delivered to Oil Process that morning by Chem Pak, were along the fence line. Of the remaining 12 containers, 11 were "process wastes" removed from a truck trailer. One container had a hazardous waste label which designated Oil Process as the generator.

Photo No. 20: Back Pad: Three of the five truck trailers were Chem Pak's waste shipments using Oil Process as a transfer station.

Photo No. 21: Adjacent to the partially constructed, temporary drum storage building were approximately 120 55-gallon drums of flammable waste being bulked to be shipped off-site on Monday, September 30, 1991.

Photo No. 22: Treatment Tanks: Tank V-1 for acid waste neutralization, chrome reduction, and metal precipitation and Tank V-2 for caustic waste neutralization and cyanide waste treatment. Tank V-3 is pictured to the far right.

Photo No. 23: Treatment Tanks: Tank V-6, used for clarification of liquid wastes, was posted with an NFPA placard that indicated the waste was corrosive, when in fact, it was not.

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Photo No. 23: Treatment Tanks: Tank V-6, used for clarification of liquid wastes, was posted with an NFPA placard that indicated the waste was corrosive, when in fact, it was not.

ATTACHMENT 3

Texas manifest #00401772

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD050806850 | Manifest Document No.: 18491.5
2. Page 1 of 7
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
OIL PROCESS COMPANY
5756 ALBA STREET
LOS ANGELES, CA 90058
* IN EMERGENCY SEE BOX 15 BELOW *

4. Generator's Phone (213) 585-5063 Attn: CHRIS LILLEY

A. State Manifest Document Number: № 00401772
B. State Generator's ID: 99906

5. Transporter 1 Company Name: CUSTOM ENVIRONMENTAL TRANSPORT
6. US EPA ID Number: DED980918858
C. State Transporter's ID: 40756
D. Transporter's Phone: 302-479-2955

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address:
ROLLINS ENVIRONMENTAL SERVICES (TX) INC.
2027 BATTLEGROUND ROAD
DEER PARK, TEXAS 77536
10. US EPA ID Number: TXD055141378
G. State Facility's ID: HW 50089001
H. Facility's Phone: 1-713-930-2300

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
X	a. EMPTY, LAST CONTAINED WASTE CORROSIVE LIQUID	003	DM	00525	P	178400
X	b. HAZARDOUS WASTE LIQUID, N.O.S. ORM-E NA9189	002	DF	00055	P	978400
X	c. ~~HAZARDOUS WASTE LIQUID, N.O.S. ORM-E NA9189~~ ~~Not Shipped~~ (JM) Hazardous waste Liquid, n.o.s., ORM-E NA9189	001 ~~001~~	DM ~~DM~~	00300 ~~00300~~	P ~~P~~	978400 ~~973400~~
X	d. HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA9189	002	DF	01170	P	978400

J. Additional Descriptions for Materials Listed Above: AO-43271-60
11A) NONE
11B) ~~K135~~ K153, F002, D007
~~11C)~~ ~~K135~~
11D) D004, D006
C.D. REQUESTED

K. Handling Codes for Wastes Listed Above: T07

15. Special Handling Instructions and Additional Information: If undeliverable return to generator. Avoid contact and wear protective gear when handling. In emergency call CHEMTEC at 1-800-424-9300 and mention "LAB PACK". Emergency Information is attached. OPC's 24 hour emergency phone number 1-213-585-5063. DOT ERG number

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
ROBERT GOLD	[signature]	04	10	91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Rudy DeLeeuw	[signature]	4	10	91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

ENTERED 4/3/9

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Date

Printed/Typed Name: J. McD Signature:

GENERATOR / TRANSPORTER / FACILITY

ATTACHMENT 4

Tracking log for 141 containers of waste from Watsons Lab

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No. CAD050806850	Manifest Document No. 04915	22. Page 2 OF 7	Information in the shaded areas is not required by Federal law.	
23. Generator's Name OIL PROCESS COMPANY, 5756 ALBA ST. LOS ANGELES, CALIF 90058 (213) 585-5063			L. State Manifest Document Number TX 00401772	M. State Generator's ID 98506
24. Transporter 1 Company Name CUSTOM ENVIRONMENTAL TRANSPORT	25. US EPA ID Number DED981118858		N. State Transporter's ID 40756	O. Transporter's Phone 1-713-930-4500
26. Transporter ___ Company Name	27. US EPA ID Number		P. State Transporter's ID	Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29. Containers No.	Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA9189	002	DM	00050	P	978400
b. WASTE CORROSIVE LIQUID, N.O.S UN1760	~~008~~ 10 (JM)	DF	00~~8~~70 6 (JM)	P	978400
c. WASTE CORROSIVE LIQUID, N.O.S. UN1760	00~~8~~ 4 (JM)	DM	00~~2~~65 0 (JM)	P	978400
d. WASTE CORROSIVE LIQUID, POISONOUS, N.O.S.	001	DM	00025	P	978400
e. WASTE CORROSIVE SOLID, N.O.S UN1759	0023 → ~~002~~ ~~24~~ 1 (JM)	DF	00~~548~~ 29 35 (JM)	P	978400
f. WASTE CORROSIVE SOLID, N.O.S UN1759	001	DM	00010	P	978400
g. WASTE FLAMMABLE LIQUID, CORROSIVE, N.O.S. FLAMMABLE LIQUID UN2924	001	DF	00500	P	978400
h. WASTE FLAMMABLE LIQUID, N.O.S. UN1993	00~~4~~ 5 (JM)	DF	00~~880~~ 22 (JM)	P	978400
i. WASTE FLAMMABLE LIQUID, N.O.S. UN1993	001	DM	00007	P	978400

S. Additional Descriptions for Materials Listed Above

28A) D007, D008 (HP-43271-6-0)
28B) D002
28C) D002, D007
28D) K088, K188, D002
28E) NONE
28F) NONE (HP-43271-6-0)
28G) D002, D001
28H) K052, F003, F005, D001, K122, K057, K159, K220, K002, K235, F002
28I) D001 (C.D. LEARNED)

T. Handling Codes for Wastes Listed Above: T07

32. Special Handling Instructions and Additional Information

Line item 28E ⇒ drum #'s ~~630~~ (JM), 632 ⇒ rejected ⇒ nonconforming Labpack. RESTX

TRANSPORTER

33. Transporter ___ Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
Rudy Deleeuw	Rudy de Leeuw	4 10 91

34. Transporter ___ Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

FACILITY

35. Discrepancy Indication Space

ENTERED 7/31/91

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

TRACKING DOCUMENT (TD1) 09/25/91

INFLUENT DRUMS DATA COLLECTION SHEET 13:31:06

DEPARTMENT 700 - FILE COPY / TIFFANY COPY / BOB COPY / CHRIS COPY

GENERATOR NAME: WATSONS LAB - PUB MANIFEST NO.: CA90181829

WORK ORDER NO.: 2052 MANIFEST DOC. NO.: 81829

REC. TYPE	LINE NO.	OPC ID.NO.	GENERATOR UNIQUE NO.	QTY	SIZE	HZ CLASS	OPC STREAM-SFX	ACT.DISP. SUFFIX	PENALTY	LAB NO.	DISPOSAL BATCH NO.	HANDLING --DATE--
MANIFEST PAGE: 1												
----------RECEIVEDED----------												
44	1	0		6	x VA	DF NR SOLID	10793 -48	--	-------			R/ 09/19/9
44	2	0		135	x VA	DF NR SOLID	10539 -48	--	-------			R/ 09/19/9
				===								

TOTAL DRUMS RECEIVED THIS MANIFEST: 141

REC. TYPE	LINE NO.	OPC ID.NO.	GENERATOR UNIQUE NO.	QTY	SIZE	HZ CLASS	OPC STREAM-SFX	ACT.DISP. SUFFIX	PENALTY	LAB NO.	DISPOSAL BATCH NO.	HANDLING --DATE--
MANIFEST PAGE: 1												
----------PROCESSEDED----------												
52	--	1701	RC-129	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-91/92	09/20/91
52	--	1702	RC-127	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-90/91	09/20/91
52	--	1703	RC-128	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-94/95	09/20/9
52	--	1704	RC-130	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-92/93	09/20/9
52	--	1705	RC-82	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-89/90	09/20/91
52	--	1706	QA-56	1	x 55	DM DEBRIS	10539 -	48	-------		C-0920-01	09/20/9
52	--	1707	QA-57	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-01	09/20/9
52	--	1708	QA-58	1	x 30	DF DEBRIS	10539 -	48	-------		C-0920-02	09/20/91
52	--	1709	QA-55	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-01/02	09/20/91
52	--	1710	RC-115	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-77/78	09/20/91
52	--	1711	RC-118	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-78	09/20/91
52	--	1712	QA-88	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-38/39	09/20/91
52	--	1713	RC-116	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-78/79	09/20/91
52	--	1714	RC-81	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-52/53	09/20/91
52	--	1715	RC-79	1	x 30	DF DEBRIS	10539 -	48	-------		C-0920-53/54	09/20/91
52	--	1716	RC-94	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-54	09/20/91
52	--	1717	RC-91	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-54/55	09/20/9
52	--	1718	QA-77	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-48	09/20/91
52	--	1719	QA-86	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-48/49	09/20/91
52	--	1720	RC-103	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-46	09/20/9
52	--	1721	RC-05	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-46/47	09/20/9
52	--	1722	QA-76	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-49/50	09/20/91
52	--	1723	QA-78	1	x 50	DF DEBRIS	10539 -	48	-------		C-0920-49	09/20/9
52	--	1724	RC-104	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-47	09/20/9
52	--	1725	RC-106	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-47/48	09/20/91
52	--	1726	RC-175	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-53	09/20/91
52	--	1727	RC-80	1	x 40	DF DEBRIS	10539 -	48	-------		C-0920-53	09/20/91

RECORD TYPE	
44-Received	54-LF Box
50-Gen.Process	55-TOX
51-Gen.PassThru	56-Fuel
52-Repack	57-Treat
53-TX Box	59-Penalty

OPC DISPOSAL SUFFIX TYPE						
01-BSB/FUEL	05-BSB/TOX		34-SOLID/TRT	39-CLB/TRT	44-PCB SOLID
02-LP/PT	06-BSB/CLB	30-RP/FS	35-TOX	40-CLA/TRT	45-NON-HAZ
03-LP/RP	07-BSB/CLA	31-TX	36-FUEL	41-ORG/TRT	46-CRUSH/LF
04-LP/REAC	08-BSB/TRT	32-SOLID/PT	37-DA	42-LIQ/RECYCLE	47-CRUSH/INC
		33-LF	38-BULK/INC	43-PCB LIQ	48-RP/DEBRIS

TRACKING DOCUMENT (TD1) 09/25/91

INFLUENT DRUMS DATA COLLECTION SHEET 13:31:06

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GENERATOR NAME: WATSONS LAB MANIFEST NO.: CA90181829

WORK ORDER NO.: 2052 MANIFEST DOC. NO.:

REC. TYPE	LINE NO.	OPC ID.NO.	GENERATOR UNIQUE NO.	QTY	SIZE	HZ CLASS	OPC STREAM-SFX		ACT.DISP. SUFFIX	PENALTY	LAB NO.	DISPOSAL BATCH NO.	HANDLING --DATE--
52	--	1728	RC-92	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-55/56	09/20/91
52	--	1729	RC-93	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-55	09/20/91
52	--	1730	RC-109	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-07	09/20/91
52	--	1731	RC-110	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-05	09/20/91
52	--	1732	RC-96	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-04	09/20/91
52	--	1733	RC-98	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-04	09/20/91
52	--	1734	RC-107	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-06	09/20/91
52	--	1735	QA-97	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-03	09/20/91
52	--	1736	RC-95	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-05	09/20/91
52	--	1737	QA-108	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-03	09/20/91
52	--	1738	RC-134	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-51	09/20/91
52	--	1739	RC-133	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-51	09/20/91
52	--	1740	RC-131	1	x 55 DF	DEBRIS	10539	-	48	-------		C-0920-52	09/20/91
52	--	1741	RC-132	1	x 55 DF	DEBRIS	10539	-	48	-------		C-0920-52	09/20/91
52	--	1742	RC-119	1	x 55 DF	DEBRIS	10539	-	48	-------		C-0920-50	09/20/91
52	--	1743	RC-121	1	x 55 DF	DEBRIS	10539	-	48	-------		C-0920-50	09/20/91
52	--	1744	RC-120	1	x 55 DF	DEBRIS	10539	-	48	-------		C-0920-51	09/20/91
52	--	1745	RC-122	1	x 55 DF	DEBRIS	10539	-	48	-------		C-0920-50	09/20/91
52	--	1746	RC-137	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-75	09/20/91
52	--	1747	RC-136	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-74	09/20/91
52	--	1748	RC-129	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-76	09/20/91
52	--	1749	RC-117	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-77	09/20/91
52	--	1750	RC-135	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-73/74	09/20/91
52	--	1751	RC-138	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-74/75	09/20/91
52	--	1752	RC-123	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-76	09/20/91
52	--	1753	RC-125	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-76/77	09/20/91
52	--	1754	RC-111	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-33/34	09/20/91
52	--	1755	RC-100	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-32/33	09/20/91
52	--	1756	RC-111	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-29	09/20/91
52	--	1757	RC-102	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-29	09/20/91
52	--	1758	RC-172	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-68/69	09/20/91
52	--	1759	RC-112	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-30	09/20/91
52	--	1760	RC-114	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-29	09/20/91
52	--	1761	RC-101	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-30/31	09/20/91
52	--	1762	RC-99	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-31/32	09/20/91
52	--	1763	RC-169	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-72	09/20/91
52	--	1764	RC-173	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-70	09/20/91

RECORD TYPE

44-Received	54-LF Box
50-Gen.Process	55-TOX
51-Gen.PassThru	56-Fuel
52-Repack	57-Treat
53-TX Box	59-Penalty

OPC DISPOSAL SUFFIX TYPE

01-BSB/FUEL	05-BSB/TOX		34-SOLID/TRT	39-CLB/TRT	44-PCB SOLID
02-LP/PT	06-BSB/CLB	30-RP/FS	35-TOX	40-CLA/TRT	45-NON-HAZ
03-LP/RP	07-BSB/CLA	31-TX	36-FUEL	41-ORG/TRT	46-CRUSH/LF
04-LP/REAC	08-BSB/TRT	32-SOLID/PT	37-DA	42-LIQ/RECYCLE	47-CRUSH/INC
		33-LF	38-BULK/INC	43-PCB LIQ	48-RP/DEBRIS

TRACKING DOCUMENT (TD1) 09/25/91

INFLUENT DRUMS DATA COLLECTION SHEET 13:31:06

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GENERATOR NAME: WATSONS LAB MANIFEST NO.: CA90181829

WORK ORDER NO.: 2052 MANIFEST DOC. NO.:

REC. TYPE	LINE NO.	OPC ID.NO.	GENERATOR UNIQUE NO.	QTY	SIZE	HZ CLASS	OPC STREAM-SFX		ACT.DISP. SUFFIX	PENALTY	LAB NO.	DISPOSAL BATCH NO.	HANDLING --DATE--
52	--	1765	RC-171	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-71/72	09/20/91
52	--	1766	RC-170	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-66	09/20/91
52	--	1767	RC-167	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-67/68	09/20/91
52	--	1768	RC-168	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-72/73	09/20/91
52	--	1769	RC-174	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-73	09/20/91
52	--	1770	RC-34	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-28	09/20/91
52	--	1771	RC-151	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-26	09/20/91
52	--	1772	RC-149	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-44/45	09/20/91
52	--	1773	RC-147	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-44	09/20/91
52	--	1774	RC-152	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-27	09/20/91
52	--	1775	RC-154	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-28	09/20/91
52	--	1776	RC-148	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-45	09/20/91
52	--	1777	RC-150	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-45/46	09/20/91
52	--	1778	RC-142	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-18	09/20/91
52	--	1779	RC-141	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-17	09/20/91
52	--	1780	NPW-3	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-17	09/20/91
52	--	1781	QC-85	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-19	09/20/91
52	--	1782	RC-50	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-14	09/20/91
52	--	1783	QZ-71	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-12	09/20/91
52	--	1784	RC-113	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-36	09/20/91
52	--	1785	QA-87	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-21	09/20/91
52	--	1786	QA-70	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-39/40	09/20/91
52	--	1787	RC-176	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-40/41	09/20/91
52	--	1788	QA-65	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-38	09/20/91
52	--	1789	NPW-6	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-37	09/20/91
52	--	1790	RC-146	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-41/42	09/20/91
52	--	1791	RC-145	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-42/43	09/20/91
52	--	1792	RC-144	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-43/44	09/20/91
52	--	1793	RC-143	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-43	09/20/91
52	--	1794	QC-80	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-61/62	09/20/91
52	--	1795	QC-79	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-60	09/20/91
52	--	1796	RC-156	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-63/64	09/20/91
52	--	1797	RC-158	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-62/63	09/20/91
52	--	1798	RC-155	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-65/66	09/20/91
52	--	1799	RC-157	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-64/65	09/20/91
52	--	1800	QC-81	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-60/61	09/20/91
52	--	1801	QZ-82	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-59	09/20/91

RECORD TYPE

44-Received	54-LF Box
50-Gen.Process	55-TOX
51-Gen.PassThru	56-Fuel
52-Repack	57-Treat
53-TX Box	59-Penalty

OPC DISPOSAL SUFFIX TYPE

01-BSB/FUEL	05-BSB/TOX		34-SOLID/TRT	39-CLB/TRT	44-PCB SOLID
02-LP/PT	06-BSB/CLB	30-RP/FS	35-TOX	40-CLA/TRT	45-NON-HAZ
03-LP/RP	07-BSB/CLA	31-TX	36-FUEL	41-ORG/TRT	46-CRUSH/LF
04-LP/REAC	08-BSB/TRT	32-SOLID/PT	37-DA	42-LIQ/RECYCLE	47-CRUSH/INC
		33-LF	38-BULK/INC	43-PCB LIQ	48-RP/DEBRIS

TRACKING DOCUMENT (TD1) 09/25/91

INFLUENT DRUMS DATA COLLECTION SHEET 13:31:06

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GENERATOR NAME: WATSONS LAB MANIFEST NO.: CA90181829

WORK ORDER NO.: 2052 MANIFEST DOC. NO.:

REC. TYPE	LINE NO.	OPC ID.NO.	GENERATOR UNIQUE NO.	QTY	SIZE	HZ CLASS	OPC STREAM	SFX	ACT.DISP. SUFFIX	PENALTY	LAB NO.	DISPOSAL BATCH NO.	HANDLING --DATE--
2	--	1802	NPW-3	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-88/89	09/20/91
52	--	1803	NPW-2	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-85/86	09/20/91
52	--	1804	NPW-5	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-86/87	09/20/91
2	--	1805	NPW-1	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-87/88	09/20/91
52	--	1806	RC-165	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-07	09/20/91
52	--	1807	RC-163	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-08	09/20/91
2	--	1808	RC-164	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-09	09/20/91
52	--	1809	QA-74	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-22	09/20/91
52	--	1810	RC-162	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-24	09/20/91
2	--	1811	RC-166	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-06	09/20/91
2	--	1812	QA-75	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-23	09/20/91
52	--	1813	QA-84	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-20	09/20/91
52	--	1814	NPW-6	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-20	09/20/91
2	--	1815	RC-161	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-22	09/20/91
52	--	1816	QA-73	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-23	09/20/91
52	--	1817	RC-160	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-24	09/20/91
2	--	1818	RC-139	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-15/16	09/20/91
52	--	1819	RC-159	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-25	09/20/91
52	--	1820	QA-68	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-18	09/20/91
2	--	1821	NONE	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-65	09/20/91
2	--	1822	RC-51	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-10	09/20/91
52	--	1823	RC-67	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-10/11	09/20/91
52	--	1824	QZ-69	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-13	09/20/91
2	--	1825	QA-72	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-21	09/20/91
52	--	1826	QC-64	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-80	09/20/91
52	--	1827	QC-66	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-79/80	09/20/91
?	--	1828	RC-84	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-84	09/20/91
?	--	1829	RC-86	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-82/83	09/20/91
52	--	1830	RC-83	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-83/84	09/20/91
?	--	1831	QC-63	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-80/81	09/20/91
?	--	1832	QC-67	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-79	09/20/91
52	--	1833	RC-85	1	x 50 DF	DEBRIS	10539	-	48	-------		C-0920-81	09/20/91
52	--	1834	QA-60	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-57	09/20/91
?	--	1835	QA-62	1	x 55 DF	DEBRIS	10539	-	48	-------		C-0920-56	09/20/91
52	--	1836	A1-61	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-56	09/20/91
52	--	1837	QA-59	1	x 40 DF	DEBRIS	10539	-	48	-------		C-0920-56/57	09/20/91
?	--	1838	RC-88	1	x 30 DF	DEBRIS	10539	-	48	-------		C-0920-57	09/20/91

RECORD TYPE

44-Received	54-LF Box
50-Gen.Process	55-TOX
51-Gen.PassThru	56-Fuel
52-Repack	57-Treat
53-TX Box	59-Penalty

OPC DISPOSAL SUFFIX TYPE

01-BSB/FUEL	05-BSB/TOX		34-SOLID/TRT	39-CLB/TRT	44-PCB SOLID
02-LP/PT	06-BSB/CLB	30-RP/FS	35-TOX	40-CLA/TRT	45-NON-HAZ
03-LP/RP	07-BSB/CLA	31-TX	36-FUEL	41-ORG/TRT	46-CRUSH/LF
04-LP/REAC	08-BSB/TRT	32-SOLID/PT	37-DA	42-LIQ/RECYCLE	47-CRUSH/INC
		33-LF	38-BULK/INC	43-PCB LIQ	48-RP/DEBRIS

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INFLUENT DRUMS DATA COLLECTION SHEET 13:31:06

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GENERATOR NAME: WATSONS LAB MANIFEST NO.: CA90181829

WORK ORDER NO.: 2052 MANIFEST DOC. NO.:

REC. TYPE	LINE NO.	OPC ID.NO.	GENERATOR UNIQUE NO.	QTY	SIZE	HZ CLASS	OPC STREAM-SFX	ACT.DISP. SUFFIX	PENALTY	LAB NO.	DISPOSAL BATCH NO.	HANDLING --DATE--
52	--	1839	RC-87	1	x 30 DF	DEBRIS	10539 -	48	-------		C-0920-58	09/20/91
52	--	1840	RC-89	1	x 30 DF	DEBRIS	10539 -	48	-------		C-0920-58	09/20/91
52	--	1841	RC-90	1	x 30 DF	DEBRIS	10539 -	48	-------		C-0920-59	09/20/91

TOTAL DRUMS PROCESSED THIS MANIFEST: 141

RECORD TYPE

44-Received	54-LF Box
50-Gen.Process	55-TOX
51-Gen.PassThru	56-Fuel
52-Repack	57-Treat
53-TX Box	59-Penalty

OPC DISPOSAL SUFFIX TYPE

01-BSB/FUEL	05-BSB/TOX		34-SOLID/TRT	39-CLB/TRT	44-PCB SOLID
02-LP/PT	06-BSB/CLB	30-RP/FS	35-TOX	40-CLA/TRT	45-NON-HAZ
03-LP/RP	07-BSB/CLA	31-TX	36-FUEL	41-ORG/TRT	46-CRUSH/LF
04-LP/REAC	08-BSB/TRT	32-SOLID/PT	37-DA	42-LIQ/RECYCLE	47-CRUSH/INC
		33-LF	38-BULK/INC	43-PCB LIQ	48-RP/DEBRIS

ATTACHMENT 5

Drum Pad Inspection Logs for September 23 and 24, 1991

WASTE CO__AINER STORAGE AREA INSPEC__ON REPORT

INSPECTED BY: Alan Mixon DATE: 09-23-91 TIME: 4:40 PM

1. Is Diked Storage Area concrete free of cracks/breaks/leaks?..... (YES)/NO

2. Is CANOPY free of structual deterioration? (Will it fall down)?. (YES)/NO

3. Are the CANOPY legs (wheels) securely anchored? .... (YES)/NO

4. Is adequate AISLE SPACE (24 inches) present between drums?...... Cl (YES/NO)

5. Is each Container Storage Area free of PUDDLED LIQUIDS?.......... (YES)/NO

6. Is area around DRUM CRUSHER free from spills debris/empty drums? — Clied Stacy (YES/NO)

7. Is area around Dike free from debris?.................. — Clied Stacy Cl (YES/NO)

8. Are Crushed Drum, LF & TX ROLLOFF BOXES covered?... — covered — Cl YES/(NO)

9. Is an empty SALVAGE DRUM and absorbent nearby? .... (YES)/NO

10. Are all DRUMS in Storage Area (A) Tightly closed? — working — ...... (YES/NO)
(B) Free from sever rusting? ...... (YES)/NO
(C) Free from bulging heads & seams? (YES)/NO
(D) Free from leaks?................ (YES)/NO
(E) Stored on pallets?............. (YES)/NO

11. Are all DRUMS marked with a (A) Hazardous Waste Label? .... (YES)/NO
(B) Begin Accumulation Date? — Recd. Date (YES/NO)
(C) With their Contents ? .... (YES)/NO
(D) Are labels visible? — still problems YES/(NO)
(E) Received Date? .... (YES)/NO

12. Are all DRUMS segregated by hazard class? — Problems working w/ Christopher Bay "B" ... YES/(NO)

13. Are all DRUMS (~~Empty~~ or Full) stored in dike area?.... Okay. Cl. (YES/NO)

14. Do Storage Area Placards properly describe waste contained?..... (YES)/NO

15. Is the DAILY DRUM INVENTORY completed and posted? .... (YES)/NO

16. Has the DRUM STORAGE TRAILER been Inspected/Inventoried today?.. YES/(NO)

17. Is a TELEPHONE easily accessible for emergencies?............... (YES)/NO

18. Is PERSONAL PROTECTIVE EQUIPMENT available nearby? .... (YES)/NO

19. Is the EYEWASH in working condition? .... (YES)/NO

20. Are the (3) FIRE EXTINGUISHERS accessible/charged/sealed?...... (YES)/NO

If any of these items are mark (NO), list item # with
comments and corrective actions. ______________________________

____

____

____

WASTE CONTAINER STORAGE AREA INSPECTION REPORT

INSPECTED BY: Alan Dixon DATE: 09-24-91 TIME: 1710

1. Is Diked Storage Area concrete free of cracks/breaks/leaks?..... (YES)/NO
2. Is CANOPY free of structual deterioration? (Will it fall down)?. (YES)/NO
3. Are the CANOPY legs (wheels) securely anchored? .... (YES)/NO
4. Is adequate AISLE SPACE (24 inches) present between drums?....... (YES)/NO
5. Is each Container Storage Area free of PUDDLED LIQUIDS?......... (YES)/NO
6. Is area around DRUM CRUSHER free from spills debris/empty drums? — Cleared Okay / Trim eliminated (YES)/(NO)
7. Is area around Dike free from debris?....... — Cleared Ok......... (YES)/(NO)
8. Are Crushed Drum, LF & TX ROLLOFF BOXES covered?... — Grey Covered (YES)/(NO)
9. Is an empty SALVAGE DRUM and absorbent nearby? .... (YES)/NO
10. Are all DRUMS in Storage Area (A) Tightly closed? .... — very poor on whole storage area YES/(NO)
    (B) Free from sever rusting? ...... (YES)/NO
    (C) Free from bulging heads & seams? (YES)/NO
    (D) Free from leaks?............... (YES)/NO
    (E) Stored on pallets?............. (YES)/NO
11. Are all DRUMS marked with a (A) Hazardous Waste Label? .... (YES)/NO
    (B) Begin Accumulation Date? — Recd. Date (YES)/(NO)
    (C) With their Contents ? .... (YES)/NO
    (D) Are labels visible? .... YES/(NO)
    (E) Received Date? .... (YES)/(NO)
12. Are all DRUMS segregated by hazard class? Probs. in Area "F" to be resolved w/ Christopher 9-25 YES/(NO)
13. Are all DRUMS (~~Empty~~ or Full) stored in dike area?.... — Wrong ... (YES)/(NO)
14. Do Storage Area Placards properly describe waste contained?..... Changed (YES)/(NO)
15. Is the DAILY DRUM INVENTORY completed and posted? .... (YES)/NO
16. Has the DRUM STORAGE TRAILER been Inspected/Inventoried today?.. YES/NO
17. Is a TELEPHONE easily accessible for emergencies?............... (YES)/NO
18. Is PERSONAL PROTECTIVE EQUIPMENT available nearby? .... (YES)/NO
19. Is the EYEWASH in working condition? .... (YES)/NO
20. Are the (3) FIRE EXTINGUISHERS accessible/charged/sealed?...... (YES)/NO

If any of these items are mark (NO), list item # with comments and corrective actions. All the Above Items Marked (No) Corrective Action Will Be Made.

[signature] 09-24-91

ATTACHMENT 6

Memorandum: Chris Lilley to Juan Beaver and Alan Dixon, December 3, 1990, Re: 12-week on-the-job training schedule through February 28, 1991.

MEMORADUM

TO: ALAN DIXON
JUAN BEAVER

FROM: CHRIS LILLEY
DRUM PROCESS MANAGER

DATE: DECEMBER 3, 1990

SUBJECT: TRAINING GUIDELINES FOR DEC. THRU FEB.

Your training period will last approximately 12 weeks from Dec. 3rd through Feb.28, 1991. Your training will consist mainly of:

1. Your use of the everyday routine equipment.
2. Standard operating procedures currently established.
3. Standard operating procedures established during your training period.
4. Drum bulk liquid processing and sampling.
5. Drum labpack processing and sampling.
6. Drum solid processing and sampling.
7. Procedures for loading/unloading/receiving/shipping.

Use the following guidelines to gauge how your overall training in progressing.

WEEKLY TRAINING GUIDELINES

WEEK	TRAINING	DESCRIPTION
1	House Keeping	The most important responsibility and probably the biggest departmental problem.
	Forklift	By end of first week unsupervised operation of lifttruck.
	Palletjack	Should not be a problem.
	Everyday Tools	Electric, Pneumatic, spark-proof tools, where things are kept, decontamination of equipment, preventive maintenance.
	Special D-Tools	Air Rachet, Drum Clamp, Tilter, Deheader, etc., proper operation and care (POC).

WEEKLY TRAINING GUIDELINES

WEEK	TRAINING	DESCRIPITION
2	Special Task-Tools	Transfer Pump, Grounding Clamps, Drum Crusher, Pallet Scale, flame-arrestor funnel, etc., POC.
	Power Tools	Rotary Hammer-Drill, ZawSaw, Circular Saw, etc., POC.
3	Wk 1 & 2 Items	Continue developing your knowledge and skills with all the equipment from week one and two.
	S.O.P.'s 1-8	Waste Abbreviations (1), Container Inspection (2), Aisle Space and Palletizing (3), Basic Labeling (4), Double Stacks (5), Drum Crushing (6), Drummed Fuel Transfers (7), Grab/Composite Drum Solid Sampling Method (8) .
4	Wk 1-3 Items	Continue developing skills.
	S.O.P.'s 9-12	Grab/Composite Drum Liquid Sampling Method (9), Unloading Procedures for Waste Containers (10), Laboratory Analytical Request Procedures (11), Solids/Sludge Repacking Procedures (12).
5	Wk 1-4 Items	Continue developing skills.
	S.O.P.'s 13-16	Drummed Corrosives Transfers (13), Cyanide Handling Procedures (14), No Procedure Yet (15), (16).
6	Wk 1-5 Items	Continue developing skills.
	S.O.P.'s 17-20	Basic Load Inspection (manifest, labeling, OP-Streams, tracking documents, inventory sheets) (17), No Procedure Yet (18), (19), (20).

WEEKLY TRAINING GUIDELINES

WEEK	TRAINING	DESCRIPTION
7	Wk 1-6 Items	Continue developing skills. Use this week to improve upon all previous weeks learning.
8	Wk 1-7 Items	Continue developing skills.
	S.O.P.'s	Waste Container Storage Area Inspection ( ), Drum Pad Waste Inventories ( ),
9	Wk 1-8 Items	Continue developing skills.
10	Wk 1-9 Items	Continue developing skills.
	S.O.P.'s	Advanced Labeling With Waste Codes ( ), Sweeper Operation, Pressure-Washer Operation, Segregation Procedures ( ),
11	Wk 1-10 Items	Continue developing skills.
12	Wk 1-11 Items	Continue developing skills.
	S.O.P.'s	Crew-Cab Pick-up Operation ( ), Labpack Breakdown/Segregation/Bulk Procedures ( ).
Extra		Yard Trucks, Vacuum Trailers, Rolloff Truck, Backhoe

DOCUMENTATION OF TRAINING

All training requires documentation to the effect that the individual was trained by a qualified person that is knowledgable with the process or equipment and all pertinent safety procedures.

All attempts will be made to get you acquainted with the equipment and procedures listed in the guidelines for training. At the completion of training of any of the items listed in the guidelines a ON-THE-JOB-TRAINING-FORM must be completed by the trainer and signed by both the trainer and trainee. It must list all items covered during training.

EXCEPTIONS

All attempts will be made to get you acquainted with the equipment and procedures listed in the guidelines. It is ultimately your responsibility to seek training on any individual or group of items. Often, due to excessively burdensome work schedules you may be required to seek training at odd times of the day. Use all qualified individuals and periods of inactivity to your advantage so that you may complete every aspect of training as quickly and easily as possible.

Not included in the guidelines are company policies, general work guidelines, vacation, holiday, sicktime, pay periods, time cards, other benefits, etc. which will be covered in the first few days of your employment or as the questions and needs arise.

QUALIFIED TRAINERS

Consult the qualified operator list for trainers qualified to teach on any of the listed equipment. If the equipment is not listed or no trainer is listed speak with your departmental manager and he/she will assign a trainer.

Do not attempt to teach yourself something without first consulting with your supervisor.

EMPLOYEE _____ HIRE DATE _____

POSITION _____

	Employee Initial	Trainer Initial	Date
Class-Room 40-hr.OSHA Training			
Location of Emergency Equipment			
House Keeping			
Forklift			
Pallet-jack			
Everday Tools			
Special D-Tools			
Special Task Tools			
Power Tools			
S.O.P. 1			
S.O.P. 2			
S.O.P. 3			
S.O.P. 4			
S.O.P. 5			
S.O.P. 6			
S.O.P. 7			
S.O.P. 8			
S.O.P. 9			
S.O.P. 10			
S.O.P. 11			
S.O.P. 12			
S.O.P. 13			
S.O.P. 14			
S.O.P. 15			
S.O.P. 16			
S.O.P. 17			
S.O.P. 18			
S.O.P. 19			
S.O.P. 20			

[redacted]yee _____ Hire Date _____
(Name)

Position _____

	Initial	Trainer Initial	Date
Class Room Training			
Safety Training			
ON THE JOB QUALIFICATION			
Chemical Mixing			
Sampling			
Drum Storage			
Filter Press			
Flotation System			
Boiler System			
Air Pump			
Centrifugal Pump			
Gear Pump			
Spill Response			
Forklift OPeration			
Location of Emergency Equipment			

Classroom Training Outline

Go over these notes a second time with new hires.

ATTACHMENT 7

Los Angeles Sanitation District Wastewater Discharge Requirements

INDUSTRIAL WASTE

PERMIT CONDITIONS

FOR

OIL PROCESS COMPANY

5756 ALBA STREET

LOS ANGELES, CA 90058

PERMIT NO. W-443069

EFFECTIVE DATE:

FEB 16 1988

Oil Process Company (OPC) is hereby permitted to operate a hazardous waste treatment facility at 5756 Alba Street and discharge treated wastewater into the Los Angeles City Sewer System. Limits identified here in for total toxic organics are interim. Final discharge standards for total toxic organics will be established after a review has been conducted by the Bureau of Sanitation on the impact of total toxic organics at the Hyperion Treatment Plant. The requirements herein supercede all existing permit conditions.

1. ISSUANCE OF THE PERMIT

The issuance of the permit is subject to the Bureau of Sanitation approval of the following:

a. Submittal of an operations and maintenance manual outlining all operational aspects of treatment of the incoming wastes from arrival at OPC to ultimate disposal or recycling.

b. A certification of the facility for the permitted processes by a Registered Engineer not connected to the construction or operation of the facility.

c. Installation of a secured discharge sampling facility with access to the Bureau of Sanitation 24 hours a day.

d. The acquisition of all applicable permits from Federal, State and Local agencies. This shall include, but not be limited to, a Hazardous Waste Facility Permit from the State Department of Health Services, a Los Angeles Fire Department Permit, and clearance from the City of Los Angeles Planning Department. The Bureau of Sanitation shall be notified of any status change of the required permits.

e. Submittal of a plot plan showing all building sewer and storm drain connections.

f. Provide a description of the Self-Monitoring Program which is to be implemented at OPC. Included shall be sampling and analysis procedures, quality control procedures, reporting procedures, and maintenance schedules of all self-monitoring equipment, and the monthly Compliance Report organizational format.

g. A detailed plan for spill containment including equipment and operating procedures to be implemented in the case of an accidental spill.

h. An on-site laboratory is required at OPC.

i. A detailed discussion on the sampling procedure which is to take place at OPC. Include only information on where sampling is to occur for determination of compliance with discharge standards. Included is to be a chart identifying the sampling location, sampling procedures, and analysis methods. This report is to be submitted within 30 days of issuance of this permit.

2. DISCHARGE WATER QUALITY LIMITATIONS

The discharge water quality limitations at OPC are identified in Table 1.

TABLE 1
POLLUTANT DISCHARGE LIMITATIONS

Constituent	Instantaneous Maximum (1) (mg/l)	24 Hr. Maximum (2) (mg/l)
Arsenic	3.0	1.5
Cadmium	1.4	0.11
Copper	6.8	3.38
Free Cyanide	1.7	0.86
Cyanide (Total)	2.4	1.2
Dissolved Sulfides	0.1	0.05
Lead	1.2	0.60
Mercury	None detectable	None detectable
Nickel	8.0	3.98
pH Range	5.5 - 11	5.5 - 11
Silver	0.9	0.43
Total Chromium	5.5	2.77
Zinc	5.2	2.61
Oil and Grease	20.0	10.0
Total Toxic Organics		
. per EPA Methods 601 and 602*	1.0	1.0
. per EPA Method 625**	1.0	1.0
. Additional Organics (listed in Table #6)	1.0	1.0
. Pesticides (listed in Table 7)	None detectable	None detectable
Radioactivity (Total a,b, and r radioactivities)	400 PCi/l (above natural background)	400 PCi/l (above natural background)

* EPA Method 601 tests specifically for purgeable halocarbons, a listing of which is found in Table 2. EPA Method 602 tests specifically for purgeable aromatics, a listing of which is found in Table 3.

** EPA Method 625 tests for base/neutral and acid extractables. Excluded in these two groups are pesticides. Table 4 lists the base/neutral extractables. Table 5 lists the acid extractables. The sum of the concentrations of the constituents found in Tables 4 and 5 must be less than or equal to 1.0 mg/l.

(1) Instantaneous Maximum - This maximum is to be met at all times of discharge. Sampling procedures are to follow EPA recommended procedures.

(2) 24 Hr Maximum - The maximum to a representative average for the a normal operational day. Sampling procedures are to follow EPA recommended Procedures.

TABLE 2

PURGEABLE HALOCARBONS ANALYZED PER EPA METHOD 601

Bromodichloromethane
Bromoform
Bromomethane
Carbon tetrachloride
Chlorobenzene
Chloroethane
2-Chloroethylvinyl ether
Chloroform
Chloromethane
Dibromochloromethane
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
Dichlorodifluoromethane
1,1-Dichloroethane
1,2-Dichloroethane
1,3-Dichloroethane
trans-1,2-Dichloroethane
1,2-Dichloropropane
cis-1,3-Dichloropropene
trans-1,3-Dichloropropene
Methylene chloride
1,1,2,2-Tetrachloroethane
Tetrachloroethane
1,1,1-Trichloroethane
1,1,2-Trichloroethane
Tetrachloroethene
Trichlorofluoromethane
Vinyl chloride

TABLE 3

PURGEABLE AROMATICS ANALYZED PER EPA METHOD 602

Benzene
Chlorobenzene
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
Ethylbenzene
Toluene

TABLE 4

BASE NEUTRAL EXTRACTABLES ANALYZED PER EPA METHOD 625

Acenaphthene
Acenaphthylene
Anthracene
Benzo(a)anthracene
Benzo(b)fluoranthene
Benzo(k)fluoranthene
Benzo(a)pyrene
Benzo(ghi)perylene
Benzyl butyl phthalate
Bis(2-chloroethyl) ether
Bis(2-chloroethoxy) methane
Bis(2-ethylhexyl) phthalate
Bis(2-chloroisopropyl) ether
4-Bromophenyl phenyl ether
2-Chloronaphthalele
4-Chlorophenyl phenyl ether
Chrysene
Dibenzo(a,h)anthracene
Di-n-butylphthalate
1,3-Dichlorobenzene
1,2-Dichlorobenzene
1,4-Dichlorobenzene
3,3'-Dichlorobenzidine
Diethyl phthalate
Dimethyl phthalate
2,4-Dinitrotoluene
2,6-Dinitrotoluene
Di-n-octylphthalate
Fluoranthene
Fluorene
Hexachlorobenzene
Hexachlorobutadiene
Hexachloroethane
Indeno(1,2,3-cd) pyrene
Isophorone
Naphthalene
Nitrobenzene
N-Nitrosodi-n-propylamine
Phenanthrene
Pyrene
1,2,4-Trichlorabenzene

TABLE 5

ACID EXTRACTABLES ANALYZED PER EPA METHOD 625

4-Chloro-3-methylphenol
2-Chlorophenol
2,4-Dichlorophenol
2,4-Dimethylphenol
2,4-Dinitrophenol
2-Methyl-4,6-dinitrophenol
2-Nitrophenol
4-Nitrophenol
Pentachlorophenol
Phenol
2,4,6-Trichlorophenol

TABLE 6

ADDITIONAL REGULATED ORGANICS

Acrolein
Acrylonitrile
Cyclohexanone
Methyl Ethyl Ketone
Tetrachloroethylene
Tetrahydrofuran
Trichloroethene
Trichloroethylene

TABLE 7

PESTICIDES

Pesticides

Aldrin
Chlordane
Dieldrin
4,4' DDT
4,4' DDE
4,4' DDD
Alpha Endosulfan
Beta Endosulfan
Endosulfan Sulfate
Endrin
Endrin Aldehyde
Heptachlor
Heptachlor Epoxide
Alpha BHC
Beta BHC
Gamma BHC (Lindane)
Delta BHC
Toxaphene
PCB 1016
PCB 1221
PCB 1232
PCB 1242
PCB 1248
PCB 1254
PCB 1260

3. Influent Water Quality Guidelines

a. OPC will be required to exercise strict control over the wastes accepted from it's customers. The waste acceptance criteria and screening procedures as outlined in Section III (G) & (H) of your California State Hazardous Waste Facility permit must be followed.

b. There will not be influent water quality limitation imposed on OPC by the Bureau of Sanitation of this time. We recommend however that wastes received with concentrations greater than those outlined in table 8 be carefully monitored to insure that adequate treatment can be accomplished.

TABLE 8

INFLUENT WATER QUALITY GUIDELINES

Constituent	Concentration (mg/l)
Oil & Grease	No limit
Flash Point	125 F
Total Toxic Organics	1,000
Dissolved Sulfides	300
pH, Non-Manifested Waste	2-14
PCB and Pesticides	50
Cyanide (Free)	10,000
Cyanide (Total)	10,000
Arsenic	100
Cadmium	150
Chromium (Total)	10,000
Copper	15,000
Mercury	150
Nickel	600
Lead	1,000
Silver	1,000
Zinc	15,000

4. OPERATIONAL REQUIREMENTS

a) A continuous pH meter and recorder shall monitor discharge to the sewer system. The recorder shall be in operation at all times, with recording information being made available to the inspector upon request. Calibration of the pH meter shall be done on a daily basis, with a log being kept which shall include all maintenance work performed. The recorder shall be inspected on a annual basis by a certified technician and noted in the maintenance log.

b) A continuous flow recorder shall monitor the discharge to the sewer system. The recorder shall be in operation at all times, with flow recordings being made available to the inspector upon request. Calibration of the recorder shall be in accordance with the manufacturer's recommendations or semi-annually if there is no stated recommendations.

c) The monitoring equipment being operated by OPC shall remain in continuous operation. Any modification to the existing monitoring system shall be submitted in writing for approval by the Bureau of Sanitation.

d) All pretreatment and self-monitoring equipment shall be maintained in proper working condition and operated by competent, trained personnel.

e) All tanks are to be held within a containment system. The containment system shall have sufficient capacity to contain the volume of the largest container plus precipitation from a 24-hour 25 year storm.

f) In the event a violation occurs OPC shall submit in writing, within seven calendar days of the violation, to the Director the following information:

- The type, amount and duration of the violation.
- A statement for the reason why the violation occurred.
- A statement of the corrective actions taken to insure future compliance.

g) In the event of an emergency, i.e. uncontrolled spill, discharge or release of fumes, OPC shall verbally notify the Bureau at (213) 485-5886 within one hour and submit a written report detailing all facts of the event within seven calendar days.

5. TYPE AND FREQUENCY OF SAMPLING AND ANALYSIS

a) Discharge Monitoring

Constituent	Type of Sample	Min. Frequency of Analysis
B.O.D.	Composite	Monthly
S.S.	Composite	Monthly
Arsenic	Composite	Once per batch
Cadmium	Composite	Once per batch
Chromium (total)	Composite	Once per batch
Copper	Composite	Once per batch
Lead	Composite	Once per batch
Mercury	Composite	Once per batch
Nickel	Composite	Once per batch
Silver	Composite	Once per batch
Zinc	Composite	Once per batch
Cyanide (Total)	Composite	Once per batch
Total Toxic Organics		
. Per EPA Test Method's 601 and 602	grab	Once per batch
. Per EPA Test Method 625	grab	Once per week
. Additional Organics listed in Table 6	grab	Once per batch
Oil and Grease	grab	Once per batch
pH	Continuous	Daily
Radioactivity	Composite	Monthly
Flow	Continuous	Daily

Definitions:

For batch discharging:

Composite and grab sampling techniques shall consist of four samples taken at various heights of the storage tank. Each sample is to be of equal proportions. The four samples are to be mixed together with the analyses being performed of this resulting mixture.

For continuous discharging

Composite sampling techniques shall consist of a sample to be taken for each hour of discharge in that particular day. These samples are to be flow weighted and composited together for analysis of required pollutants. Grab sampling shall consist of one sample to be taken during time of peak flow.

b) All analyses shall be performed in a laboratory approved by the Director of the Bureau of Sanitation. All samples shall be taken by trained personnel and be analyzed within the appropriate time period.

c) All samples taken and all analyses shall be performed in accordance with the latest edition of "Standard Methods for the Examination of Water and Wastewater" or EPA approved methods.

6. FILING OF REPORTS

One copy of the monthly Compliance Report shall be submitted to the Bureau of Sanitation by the 15th of the following month. Each written report shall contain the following information:

1. Name of company, installation address, telephone number, permit number and reporting period.

2. Tabulated results of each batch discharged. Included is to be the date, approximate volumes discharged, the time discharged occurred and the resultant analyses.

3. A summary of waste materials leaving the plant other than being discharged to the sanitary sewer. Indicate types of materials, quantities, locations of disposal and name of hauler.

4. A summary of rejected loads. Indicate name of waste generator, quantity of load, date load rejected and reason why rejected.

5. A discussion of any discharge violation or emergency which occurred and the corrective action taken.

6. Each report shall contain the following completed declaration signed by a designated officer of OPC.

" I declare under penalty of perjury that the foregoing is true and correct."
Executed on the _____ day of _____
_____ Signature
_____ Title

7a. OPC shall mail an original signed copy of the monthly Compliance Report and all other reports to:

Delwin A. Biagi, Director
Bureau of Sanitation
Room 1420, City Hall East
200 North Main Street
Los Angeles, CA 90012

Attn: Permitting Section

b. OPC shall maintain all sampling and analytical results, including strip charts; date, exact place, and time of sampling; date analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge or when requested by the Director.

DJ 20/pcb

ATTACHMENT 8

Financial Assurances dated August 3, 1990 and December 1, 1990

Oil Process Company OPC

March 6, 1990

Department of Health Services
Lucille Van Ommering
Financial Responsibility Unit
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234

RE: FINANCIAL RESPONSIBILITY
EPA I.D. #: CAD050806850

Dear Ms. Van Ommering:

Enclosed is a letter from Southern California Bank increasing our Letter of Credit to $332,779 to fulfill Oil Process Company's requirement for evidence of adequate financial assurance for closure costs. The need for an increase was noted in your letter of 31 January 1990.

Please contact me at (213) 585-5063 should you have any questions.

Sincerely,

Ronald M. Reed
General Manager

RMR/kt

Enclosure

cc: Douglas Bautista
D.O.H.S. Permitting
Region 3

Scott Simpson
D.O.H.S. Surveillance & Enforcement Unit
Region 3

Ron Cronman
EPA - Region IX

Certified Mail

Southern California Bank

March 2, 1990

Toxic Substances Control Division
Department of Health Services
714/744 P. Street
Sacramento, California 92814

RE: Oil, Inc. DBA Oil Process Company
5756 Alba Street
Los Angeles, California 90058
Our Letter of Credit #422-85-27

Gentlemen:

Please be advised that our Letter of Credit No. 422-85-27 dated March 29, 1985 is hereby amended as follows:

The aggregate amount has been increased to #332,779.00, THREE HUNDRED THIRTY TWO THOUSAND SEVEN HUNDRED SEVENTY NINE United States Dollars.

All other terms and conditions remain unchanged.

Sincerely,

David W. Wheatley
Executive Vice President/Chief Operating Officer

DW:es

OUR SILVER ANNIVERSARY 25th YOUR GOLDEN OPPORTUNITY

Oil Process Company

December 20, 1990

State of California Department of Health Services
Toxic Substance Control Program/Region 3
1405 North San Fernando Blvd., Suite 300
Burbank, CA 91504

ATTENTION: Mr. Dennis Dickerson

RE: OIL, INC. dba OIL PROCESS COMPANY LIABILITY INSURANCE
EPA ID NO. CAD050806850

Dear Mr. Dickerson:

Attached is a set of new liability insurance policy Certificates of Insurance. The set consists of (1) a "non-sudden accidental occurrences policy Certificate, with a limit of $10 million per occurrence and $10 million annual aggregate; and (2) a "sudden accidental occurrences" policy Certificate with a limit of $5 million per occurrence and $5 million annual aggregate.

These policies are printed on forms provided by the State of California and are submitted as required under Health and Safety Code Section 25245 in order to verify adequate financial assurance of Hazardous Waste Facilities.

If you have any questions on this, please give me a call at 213-585-5063.

Sincerely,

Ronald M. Reed
Vice President, General Manager

cc: U.S. Environmental Protection Agency - Region 9
ATTENTION: Mr. Tom Kelley
75 Hawthorn Street (H-3-2)
San Francisco, CA 94105

State of California—Health and Welfare Agency

Department of Health Services

LIABILITY CERTIFICATE OF INSURANCE

If additional space is needed, add attachment.

Insurer Name	Address	License Number
VIRGINIA SURETY COMPANY, INC.	123 North Wacker Drive CHICAGO, IL 60606	Issued by State of:

Insured Name	Address
OIL, INC. d/b/a OIL PROCESS COMPANY	5756 ALBA STREET LOS ANGELES, CALIF 90058

Hazardous Waste Facilities Covered: *(Enter Information For Each Facility)*

NAME	ADDRESS	ID NUMBER	LIMITS OF LIABILITY: SUDDEN* OCCURRENCES *Each Occurrence/ Annual Aggregate Amount*	LIMITS OF LIABILITY: NONSUDDEN* OCCURRENCES *Each Occurrence/ Annual Aggregate Amount*
OIL, INC. d/b/a OIL PROCESS COMPANY	5756 ALBA STREET LOS ANGELES, CALIF 90058	CAD 050806850	/	10,000,000 10,000,000 /
			/	/
			/	/
Policy Number UMB 21086		Effective Date 12/01/90	Total /	Total 10,000,00 10,000,00 /

**Excluding legal costs and deductibles.*

INSURER CERTIFICATION:

1. The Insurer hereby certifies that it has issued liability insurance covering bodily injury and property damage to the insured listed above in connection with the insured's obligation to demonstrate financial responsibility under Division 30, Title 22, California Code of Regulations. The coverage applies to the above listed facilities for:

"NONSUDDEN ACCIDENTAL OCCURRENCES"

(Insert "sudden accidental occurrences," "nonsudden accidental occurrences," or "sudden and nonsudden accidental occurrences"; if coverage is for multiple facilities and the coverage is different for different facilities, indicate which facilities are insured for sudden accidental occurrences, which are insured for both.)

The limits of liability are the amounts stated above for "each occurrence" and "annual aggregate," exclusive of legal defense costs. If the endorsement is for an excess insurance policy, complete the following sentence:
"$ _____ each occurrence and $ _____ annual aggregate in excess of the underlying limits of $ _____ each occurrence and $ _____ annual aggregate."

2. The Insurer further certifies the following with respect to the insurance described above;

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in Section 67030, Title 22, California Code of Regulations.

(c) Whenever requested by the Department of Health Services (DHS), the Insurer agrees to furnish to DHS a certified copy of the original policy and all endorsements.

State of California—Health and Welfare Agency

Department of Health Services

LIABILITY CERTIFICATE OF INSURANCE

If additional space is needed, add attachment.

Insurer Name	Address	License Number
VIRGINIA SURETY COMPANY, INC.	123 North Wacker Drive CHICAGO, IL 60606	Issued by State of:

Insured Name	Address
OIL, INC. d/b/a OIL PROCESS COMPANY	5756 ALBA STREET LOS ANGELES, CALIF 90058

Hazardous Waste Facilities Covered: *(Enter Information For Each Facility)*

NAME	ADDRESS	ID NUMBER	LIMITS OF LIABILITY: SUDDEN* OCCURRENCES *Each Occurrence/ Annual Aggregate Amount*	LIMITS OF LIABILITY: NONSUDDEN* OCCURRENCES *Each Occurrence/ Annual Aggregate Amount*
OIL, INC. d/b/a OIL PROCESS COMPANY	5756 ALBA STREET LOS ANGELES, CALIF 90058	CAD 050806850	5,000,000 5,000,000	/ /
			/ /	/ /
			/ /	/ /
Policy Number		Effective Date	Total	Total
UMB 21085		12/01/90	5,000,000 5,000,000	/ /

**Excluding legal costs and deductibles.*

INSURER CERTIFICATION:

1. The Insurer hereby certifies that it has issued liability insurance covering bodily injury and property damage to the insured listed above in connection with the insured's obligation to demonstrate financial responsibility under Division 30, Title 22, California Code of Regulations. The coverage applies to the above listed facilities for:

"SUDDEN ACCIDENTAL OCCURRENCES"

(Insert "sudden accidental occurrences," "nonsudden accidental occurrences," or "sudden and nonsudden accidental occurrences"; if coverage is for multiple facilities and the coverage is different for different facilities, indicate which facilities are insured for sudden accidental occurrences, which are insured for both.)

The limits of liability are the amounts stated above for "each occurrence" and "annual aggregate," exclusive of legal defense costs. If the endorsement is for an excess insurance policy, complete the following sentence:
"$ _____ each occurrence and $ _____ annual aggregate in excess of the underlying limits of $ _____ each occurrence and $ _____ annual aggregate."

2. The Insurer further certifies the following with respect to the insurance described above;

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in Section 67030, Title 22, California Code of Regulations.

(c) Whenever requested by the Department of Health Services (DHS), the Insurer agrees to furnish to DHS a certified copy of the original policy and all endorsements.

STATE COMPENSATION INSURANCE FUND

HOME OFFICE SAN FRANCISCO

ANNUAL RATING ENDORSEMENT

IT IS AGREED THAT THE CLASSIFICATIONS AND RATES PER $100 OF REMUNERATION APPEARING IN THE CONTINUOUS POLICY ISSUED TO THIS EMPLOYER ARE AMENDED AS SHOWN BELOW.

HERE ARE YOUR NEW RATES FOR THE PERIOD INDICATED. IF YOUR NAME OR ADDRESS SHOULD BE CORRECTED OR IF INSURANCE IS NOT NEEDED FOR NEXT YEAR, PLEASE TELL US.

IMPORTANT THIS IS NOT A BILL
SEND NO MONEY UNLESS STATEMENT IS ENCLOSED

CONTINUOUS POLICY 1122489-89

THE RATING PERIOD BEGINS AND ENDS AT 12:01AM PACIFIC STANDARD TIME

RATING PERIOD 11-01-89 TO 11-01-90

OIL INC.
1848 E. 55TH STREET
VERNON, CALIF 90058

DEPOSIT PREMIUM
MINIMUM PREMIUM
PREMIUM ADJUSTMENT PERIOD
REP 02

NAME OF EMPLOYER- OIL INC.
A CORPORATION

CODE NO.	PRINCIPAL WORK AND RATES EFFECTIVE TO 11-01-90
4511	ANALYTICAL OR TESTING LABORATORIES-- INCLUDING OUTSIDE OPERATIONS--N.P.D.
6206	OIL OR GAS WELLS--CEMENTING
8742	SALESPERSONS--OUTSIDE.
8810	CLERICAL OFFICE EMPLOYEES--N.O.C.
8227	CONSTRUCTION OR ERECTION PERMANENT YARDS

TOTAL ESTIMATED ANNUAL PREMIUM

ACORD CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)
8/3/90

PRODUCER
ROLLINS BURDICK HUNTER OF PA, INC.
526 PUBLIC LEDGER BLDG.
SEVENTH AND CHESTNUT STS.
PHILADELPHIA, PA 19106
PHONE: (215) 925-6100

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED
Oil, Inc. d/b/a Oil Process Company
5756 Alba Street
Los Angeles, CA 90058

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A: Virginia Surety
COMPANY LETTER B: Continental Insurance Company
COMPANY LETTER C: National Union
COMPANY LETTER D:
COMPANY LETTER E:

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIABILITY LIMITS IN THOUSANDS — OCCURRENCE	AGGREGATE
	GENERAL LIABILITY					
A	X COMPREHENSIVE FORM	UMB 21013	6/1/90	10/1/91	BODILY INJURY $	$
	X PREMISES/OPERATIONS (UNDERGROUND EXPLOSION & COLLAPSE HAZARD)	Occurrence Form			PROPERTY DAMAGE $	$
	X PRODUCTS/COMPLETED OPERATIONS				BI & PD COMBINED $ 1,000	$ —
	X CONTRACTUAL					
	X INDEPENDENT CONTRACTORS					
	X BROAD FORM PROPERTY DAMAGE					
	X PERSONAL INJURY				PERSONAL INJURY	$ 1,000
	X S & A Pollution					
	AUTOMOBILE LIABILITY					
B	X ANY AUTO	SRL 3636818	6/1/90	10/1/91	BODILY INJURY PER PERSON $	
	X ALL OWNED AUTOS (PRIV PASS)				BODILY INJURY PER ACCIDENT $	
	X ALL OWNED AUTOS (OTHER THAN PRIV PASS)	Occurrence Form			PROPERTY DAMAGE $	
	X HIRED AUTOS					
	X NON-OWNED AUTOS					
	X GARAGE LIABILITY					
	X S & A Pollution				BI & PD COMBINED $ 1,000	
	EXCESS LIABILITY					
	UMBRELLA FORM	CBM 12075			BI & PD COMBINED $ 5,000	$ —
A	X OTHER THAN UMBRELLA FORM	Following Form	6/1/90	10/1/91		
	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY	
					$ EACH ACCIDENT	
					$ DISEASE-POLICY LIMIT	
					$ DISEASE-EACH EMPLOY	
	OTHER					
C	Pollution Legal Liab.	PLL 7166193 (Non-Sudden Acc. Pollution)	11/4/89	11/4/90	$10,000/10,000 (Plant Site Only)	

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

COVERS ALL OPERATIONS OF THE NAMED INSURED

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE cc: M. Rachford-Oil

ACORD 25-S (8/88)